

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GLADYS YOLTON, WILBUR MONTGOMERY,
ELSIE TEAS, ROBERT BETKER, EDWARD
MAYNARD, and GARY HALSTED, on behalf
of themselves and a similarly situated class,

Plaintiffs,

Case No. 02-CV-75164

v

Patrick J. Duggan

EL PASO TENNESSEE PIPELINE CO., and
CNH AMERICA LLC,

Class Action

Defendants.

EXHIBIT 1

TO

PLAINTIFFS' MOTION FOR ATTORNEY FEES AND EXPENSES

AFFIDAVIT OF ROGER J. McCLOW
August 12, 2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

GLADYS YOLTON, WILBUR MONTGOMERY,
ELSIE TEAS, ROBERT BETKER, EDWARD
MAYNARD, and GARY HALSTED, on
behalf of themselves and a class of persons
similarly situated,

Hon. Patrick J. Duggan

Case No. 02-CV-75164

Plaintiffs,

CLASS ACTION

v.

EL PASO TENNESSEE PIPELINE CO., and
CNH AMERICA, LLC,

Defendants.

KLIMIST, McKNIGHT, SALE,
McCLOW & CANZANO, P.C.
By: Roger J. McCLOW (P27170)
Counsel for Plaintiffs
400 Galleria Officentre, Suite 117
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KIENBAUM OPPERWALL HARDY
& PELTON, P.L.C.
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William B. Forrest III (P60311)
Counsel for Defendant El Paso
325 South Old Woodward Avenue
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HONIGMAN MILLER SCHWARTZ
AND COHN LLP
By: Norman C. Ankers (P30533)
Counsel for Defendant CNH America, LLC
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
(313) 465-7000

FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON
By: Stephanie Goldstein
Counsel for Defendant El Paso
One New York Plaza
New York, NY 10004-1980
(212) 859-8000

McDERMOTT WILL & EMERY LLP
By: Bobby R. Burchfield
Counsel for Defendant CNH America, LLC
600 13th Street, N.W.
Washington, D.C. 20005-3096
(202) 756-8000

AFFIDAVIT OF ROGER J. McCLOW
IN SUPPORT OF MOTION FOR ATTORNEY FEES

STATE OF MICHIGAN)
)ss
COUNTY OF OAKLAND)

Roger J. McClow, being first duly sworn, states as follows:

1. I am Of Counsel to the law firm of Klimist, McKnight, Sale, McClow & Canzano, P.C., in Southfield, Michigan. I have been associated with the Firm since 1981 and, from 1983 through March 2008, I was a partner.

2. I graduated magna cum laude from Wayne State University Law School in Detroit, Michigan in 1976. I have been a member of the Michigan State Bar since May of 1977. I have extensive trial and appellate experience before Michigan courts, federal courts and the National Labor Relations Board. I am admitted to practice before the Fourth, Sixth and Eighth Circuit Courts of Appeals and the United States Supreme Court. I have practiced in federal district courts in Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, New Jersey (bankruptcy), New York, Ohio, Oklahoma, Pennsylvania, Texas, Virginia and Wisconsin. I am rated AV by Martindale Hubbell and have been listed in Who's Who in American Law since 1994 and in Who's Who in America since 1998.

3. My practice consists primarily of labor law litigation representing unions and employees in the state and federal courts, before administrative agencies and in arbitrations. My practice focuses on federal court litigation.

4. I have been a speaker on labor law topics before the American Bar Association, Michigan's Institute of Continuing Legal Education and the State Bar of Michigan. I was a member of the Labor and Employment Committee of the State Bar of Michigan from 1992 through 1996. I am the author of *Labor Law and Unemployment Compensation*, Wayne Law Review, Vol. 35, No. 2 (Winter 1989) and *Class Action Issues in Retiree Health Care Litigation Under ERISA and Section 301*, www.bna.com/bnabooks/ababna/annual/99/annual48 (1999).

5. I have litigated several complex state and federal court cases involving multiple parties and hundreds of millions of dollars. I was one of the trial attorneys in the successful age discrimination action arising out of the closing of NL Industries' Doehler-Jarvis plant in Grand Rapids, Michigan. *See Adama v. Doehler-Jarvis*, 115 Mich. App. 82 (1982), *rev'd* 419 Mich. 905 (1984), *on rem.* 144 Mich. App. 764 (1985), *rem.* 424 Mich. 705 (1986).

6. I represented retirees in enforcing the judgment in the seminal retiree insurance case of *UAW v. Yardman*, 716 F.2d 1476 (6th Cir. 1983). I handled the class action litigation for plaintiffs in the retiree insurance case of *UAW v. Ross Valve* in the Eastern District of Michigan in 1984. I represented retirees of Echlin Inc.'s Owosso plant in a class action retiree health insurance lawsuit, *UAW Local 836 v. Echlin, Inc.*, 670 F. Supp. 697 (E.D. Mich. 1986), which involved approximately 90 retirees.

7. I was Class Counsel in two related retiree health care cases, *Haggerty v. NL Industries*, No. 87-1292 (W.D.N.Y.) and *Farley v. UAW and Paolucci*, No. 90-6195 (E.D. Pa.), in which NL and Farley separately sought declaratory judgments that they were not required to provide lifetime medical benefits for retirees. Those cases were settled in 1992. NL agreed to pay approximately \$2.5 million, or 75% of accrued out of pocket medical claims. NL and Farley both agreed to provide a modified lifetime medical plan for retirees. The combined estimated present value of those plans was in excess of \$80 million. As part of the settlement, Farley placed approximately \$100 million worth of its major asset, Fruit of the Loom stock, in escrow to guarantee payment of benefits it agreed to provide.

8. I was Class Counsel in the salaried retiree health care benefits case, *Colby v. Massey-Ferguson*, 94-71698-DT (E.D. Mich.), which was settled in 1997. In the settlement, Lucas Varity (the successor to Massey-Ferguson, now owned by TRW) agreed to provide lifetime health care benefits to the Class and a Modified Health Care Plan for Pre-1984 Class Members, who comprised

a vast majority of the Class. The Modified Plan was a substantial improvement over the plan Massey-Ferguson had implemented in 1994 which had led to the litigation. Lucas Varity also paid \$2.35 million into a Common Fund for attorney fees and reimbursement of health care expenses incurred by Pre-1984 Class Members.

9. I was Class Counsel for retirees and surviving spouses in *Fox v. Massey-Ferguson*, 172 F.R.D. 653 (E.D. Mich. 1995), *affirmed* 91 F.3d 143 (6th Cir. 1996), an hourly retiree health care case. That case was also settled in 1998 after a trial before Judge Julian Cook. Under the Settlement Agreement, the Company agreed to provide a health care benefit plan for the lives of retirees and surviving spouses with no premium contribution. It also agreed to pay 100% of the out of pocket costs the Class Members incurred until the May 31, 1995 preliminary injunction went into effect.

10. I was Class Counsel for a Class of retirees and surviving spouses in *Golden v. Kelsey-Hayes*, No. 93-CV-40530 (E.D. Mich.), another retiree health care case. Judge Paul V. Gadola initially issued a preliminary injunction, 845 F. Supp. 410 (E.D. Mich. 1994), *aff'd* 73 F.3d 648 (6th Cir. 1996), and subsequently granted plaintiffs' motion for summary judgment. 954 F. Supp. 1173 (E.D. Mich. 1997). The parties then entered into a settlement providing for 100% health care coverage for life and for all damages incurred less \$250.00 per class member.

11. I was class counsel in the retiree health care case of *Gilbert v. Doehler-Jarvis, Inc. and Harvard Industries*, Case No. 3:99 CV 7395 (N.D. Ohio), which involved more than 500 retirees and surviving spouses of retirees, from Doehler-Jarvis' facilities in Ohio and Pennsylvania who retired after Farley sold those facilities in 1990. In *Gilbert*, the court entered summary judgment in favor of the retirees on March 6, 2000, nine days before Doehler-Jarvis intended to terminate the benefits. *Gilbert v. Doehler-Jarvis, Inc.*, 87 F. Supp. 2d 788 (N.D. Ohio 2000). The court entered its final judgment in favor of the retirees on June 28, 2001.

12. I am or have been class counsel for in several other retiree health care actions, including *Brock v. Industrial Metal Products*, Case No. Case No. 1:01-405 (W.D. Mich.); *Hunt v. Melling Forging*, Case No. 1:99-914 (W.D. Mich.); *Burcicki v. Newcor Tool, Inc.*, Case No. 02-70230 (E.D. Mich.); *La Forest v. Honeywell International, Inc.*, Case No. 03-6248T (W.D.N.Y.); *Vance v. Tenneco Automotive Operating Co.*, Case No. 04-60012 (E.D. Mich.); *Neil v. Raytheon, Inc.*, Case No. 05-2521-B (N.D. Tex.); *Shotwell v. Owens Corning*, Case No. 2:07-13673 (E.D. Mich.); and *Audia v. Newcor, Inc.*, Case. No. 10-10209 (E.D. Mich.). Each of these cases were settled. In all but, *Melling Forging*, the settlement included lifetime health care and prescription drug benefits with no premium contribution and damages. In *Melling Forging*, the settlement provided for damages and additional pension and medical expense payments over a ten year period.

13. I am class counsel in the companion case of *Reese v. CNH America LLC*, Case No. 04-70592, currently pending before this Court, an action covering more than 3000 retirees and spouses. On August 29, 2007, this Court issued an Opinion and Order in *Reese* granting plaintiffs' motion for summary judgment. *Reese v. CNH America LLC*, 2007 WL 2484989 (E.D. Mich. 2007). That decision was affirmed in part, reversed in part and remanded for further proceedings. 574 F.3d 315 (6th Cir. 2009). On March 3, 2011, this Court granted plaintiffs' motion for summary judgment. The Judgment was entered on May 10, 2011. The case is now on appeal before the Sixth Circuit.

14. Attached to this Affidavit are two Exhibits showing the legal services provided and expenses incurred in this matter. These Exhibits are true and accurate records of my firm's services and expenses.

Exhibit A is a record of attorney hours spent on this case by lawyers currently employed by the Firm from October 2002 through July 31, 2011. In addition, three associates who are no longer with the Firm worked on this case: Michael O'Hearon worked 81.25 hours in January and February 2003; William Karges worked 331.50 hours between April 2003 and May 2007; and Kimberly Saks

worked 10.75 hours between July 2007 and October 2007. My time records and the time records of the other attorneys were maintained contemporaneously with the hours worked.

Exhibit B is a summary of the litigation expenses incurred from October 2002 through July 31, 2011. The dedicated clerical services, which include copying and mailing services, represent 454 hours at \$20.00 per hour.


15. The following are the totals from the attached Exhibits:

A. Attorney Hours	Roger J. McClow	6573.75 Hrs.
	Samuel C. McKnight	636.50 Hrs.
	Other Partners	42.75 Hrs.
	John Canzano	1.25 Hrs.
	Judy Sale	35.00 Hrs.
	David Radtke	.75 Hrs.
	Lisa Smith	5.75 Hrs.
	Associates	449.75 Hrs.
	Patrick Rorai	15.75 Hrs.
	Meagan Dolleris	10.50 Hrs.
	William Karges	331.50 Hrs.
	Michael O'Hearon	81.25 Hrs.
	Kimberly Saks	10.75 Hrs.
	Total Attorney Hours	7,702.75 Hrs.
B. Paralegal Hours - December 2002 - September 2010		3,476.00 Hrs.
C. Litigation Expenses		\$198,872.95



ROGER J. McCLOW

Subscribed and sworn to before
me this 12th day of August 2011



SANDRA J. COWELL, Notary Public
Wayne County, MI (Acting in Oakland)
My Commission Expires: September 30, 2011

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GLADYS YOLTON, WILBUR MONTGOMERY,
ELSIE TEAS, ROBERT BETKER, EDWARD
MAYNARD, and GARY HALSTED, on behalf
of themselves and a similarly situated class,

Plaintiffs,

Case No. 02-CV-75164

v

Patrick J. Duggan

EL PASO TENNESSEE PIPELINE CO., and
CNH AMERICA LLC,

Class Action

Defendants.

EXHIBIT A

TO

**AFFIDAVIT OF ROGER J. MCCLOW IN SUPPORT OF
MOTION FOR ATTORNEY AND EXPENSES**

ATTORNEY HOURS FOR

Roger J. McClow

Samuel C. McKnight

Judith A. Sale

Lisa M. Smith

David R. Radtke

Patrick J. Rorai

Meagan B. Dolleris

October 1, 2002 through July 31, 2011

ATTORNEY HOURS
Roger McClow (Through July 31, 2011)

Date: Mon Oct 21, 02

Time: 0.25

Activity: Telephone conference with Mike Saggau

Date: Tue Oct 22, 02

Time: 0.25

Activity: Telephone conference with Mike Saggau

Date: Thu Oct 24, 02

Time: 0.75

Activity: Review complaint; telephone conference with Mike Saggau

Date: Mon Oct 28, 02

Time: 2.25

Activity: Telephone conference with Saggau (twice); telephone conference with John Yolton; telephone conference with Wilbur Montgomery; telephone conference with Elsie Teas; telephone conference with Robert Betker; telephone conference with Edward Maynard

Date: Tue Oct 29, 02

Time: 1.00

Activity: Telephone conference with Gary Halstead; telephone conference with Saggau; review Complaint

Date: Fri Nov 1, 02

Time: 2.75

Activity: Telephone conference with Jennifer Dewitt; telephone conference with Tom Center; telephone conference with Saggau; conference with Saggau

Date: Mon Nov 4, 02

Time: 1.50

Activity: Create Access database; correspondence with class representatives

Date: Tue Nov 5, 02

Time: 0.25

Activity: Telephone conference with Stephanie Goldstein, attorney for El Paso

Date: Mon Nov 18, 02

Time: 0.50

Activity: Telephone conference with Mike Saggau; telephone conference with Stephanie Goldstein

Date: Fri Nov 22, 02

Time: 0.25

Activity: Telephone conference with Saggau

Date: Tue Dec 3, 02

Time: 1.25

Activity: Telephone conference with Mike Saggau (twice); telephone conference with Bill Humphrey, President of Local 1304; correspondence with President Humphrey

Date: Thu Dec 5, 02

Time: 0.50

Activity: Review and revise Stipulation

Date: Tue Dec 10, 02

Time: 0.50

Activity: Telephone conference with Bill Humphrey; draft letter to retirees re meeting

Date: Wed Dec 11, 02

Time: 0.25

Activity: Telephone conference with Mike Saggau

Date: Mon Dec 16, 02

Time: 0.25

Activity: Telephone conference with Bill Humphrey

Date: Tue Dec 17, 02

Time: 5.00

Activity: Travel to Moline

Date: Wed Dec 18, 02

Time: 11.00

Activity: Review documents; attend retiree meeting at Local 1304; confer with Bill Humphries, Jim Reynolds and Dick Sanders

Date: Thu Dec 19, 02

Time: 5.25

Activity: Telephone conference with Dan Sherrick; travel from Moline; telephone conference with Gladys Yoltan; telephone conference with Tom Seymour; telephone conference with Mike Saggau

Date: Fri Dec 20, 02

Time: 0.75

Activity: Telephone conference with Mike Saggau; review Bettendorf database

Date: Sat Dec 21, 02

Time: 0.25

Activity: Organize file

Date: Mon Dec 23, 02

Time: 3.50

Activity: Telephone conference with Saggau (several times); review and revise Complaint; telephone conference with Galdys Yolton (twice); draft, review and revise Complaint; draft cover sheet; draft summons; telephone conference with Sandra Graf Radtke; telephone conference with Wilbur Montgomery

Date: Tue Dec 24, 02

Time: 3.00

Activity: Organize files; correspondence with Leaford Burnett; review various lists of class members

Date: Thu Dec 26, 02

Time: 0.50

Activity: Review Rock Island and Bettendorf databases

Date: Mon Dec 30, 02

Time: 5.25

Activity: Telephone conference with Geraldine Klavenga; review and revise database; search Social Security death index

Date: Tue Dec 31, 02

Time: 7.50

Activity: Telephone conference with John Setty; review database; prepare for mailing; correspondence with Goldstein and Ankers

Date: Thu Jan 2, 03

Time: 10.00

Activity: Telephone conference with John Setty; Telephone conference with Tom Seymour (3); telephone conference with Helen Heiland; draft letters to retirees and surviving spouses re meetings; create Questionnaires; oversee mailings

Date: Fri Jan 3, 03

Time: 4.00

Activity: Telephone conference with attorney Stephanie Goldstein; telephone conference with Saggau; telephone conference with Bill Humphrey; telephone conference with Bill Vallee (twice); draft letters to retirees; telephone conference with Tom Kienbaum; create Questionnaires for Local 1306 and 1356 retirees; oversee mailings to retirees re meetings; telephone conference with Helen Heiland; review database

Date: Mon Jan 6, 03

Time: 3.25

Activity: Prepare mailing for Terre Haute retiree meeting; draft letter; prepare Questionnaire; review Social Security death index; telephone conference with John Setty

Date: Tue Jan 7, 03

Time: 1.25

Activity: Telephone conference with Tony Wallace, Local 807 President; telephone conference with Jennifer Dewitt; telephone conference with Irene Hall; review retiree lists for Local 807 - Burlington

Date: Wed Jan 8, 03

Time: 7.00

Activity: Telephone conference with Bill Vallee; telephone conference with Tony Wallace; review and revise database; prepare for and travel to Moline

Date: Thu Jan 9, 03

Time: 12.00

Activity: Attend retiree meetings in Bettendorf; conference with Tom Seymour; review documents

Date: Fri Jan 10, 03

Time: 12.00

Activity: Attend retiree meetings at Local 1304 in East Moline; travel to Detroit

Date: Mon Jan 13, 03

Time: 4.50

Activity: Telephone conference with Mike Saggau; telephone conference with John Valko; review documents; review returned questionnaires; telephone conference with Case attorney Sieve; telephone conference with Fred Mock; telephone conference with Helen Andrews; telephone conference with Ms. Timmons

Date: Tue Jan 14, 03

Time: 2.00

Activity: Review documents; review census records; review file re Motion for Class Certification

Date: Wed Jan 15, 03

Time: 3.25

Activity: Telephone conference with John Valko; telephone conference with Sherry Horton; draft meeting letters; draft Questionnaire; review and revise database

Date: Thu Jan 16, 03

Time: 10.00

Activity: Attend retiree meeting in Terre Haute; travel from Terre Haute

Date: Fri Jan 17, 03

Time: 4.25

Activity: Correspondence with Goldstein and Sieve; review and organize documents produced by class members; review database

Date: Mon Jan 20, 03

Time: 7.50

Activity: Review returned questionnaires; telephone conference with Mrs. Terpstra; review Insurance Agreements; correspondence with Saggau; draft memorandum in support of class certification; draft first request for production of documents; review and revise data base; correspondence with Racine surviving spouses; create address labels and questionnaires for Racine surviving spouses; telephone conference with Ronald Pearce

Date: Tue Jan 21, 03

Time: 4.50

Activity: Telephone conference with Lola Webster; telephone conference with Alicia Kelley; telephone conference with Saggau; telephone conference with Melani Paros' daughter; prepare questionnaires for additional Racine surviving spouses; draft letters for additional meeting notice; oversee mailing; telephone conference with Gerladine Klavenga; review benefit alternatives re settlement; draft form affidavit

Date: Wed Jan 22, 03

Time: 7.50

Activity: Telephone conference with Helen Heiland; telephone conference with Ruby Franks; review e-mail from Sherry Horton re class Members; e-mail Horton; telephone conference with Kevin, Local 807; prepare letters and questionnaires; draft subjects for Summation data base; prepare for and travel to Moline

Date: Thu Jan 23, 03

Time: 11.00

Activity: Travel from Davenport to Burlington, Iowa; review documents at Local 807

Date: Fri Jan 24, 03

Time: 12.00

Activity: Conduct meeting with retirees; review documents; travel from Burlington to Detroit

Date: Sun Jan 26, 03

Time: 2.00

Activity: Review documents; review data base re Class Members; review motion for class certification; draft Affidavit for class certification motion

Date: Mon Jan 27, 03

Time: 7.00

Activity: Telephone conference with Gary Halstead; telephone conference with Dan Sanford; telephone conference with Wilbur Montgomery; telephone conference with Bill Cox; telephone conference with Jo Ann Peperak; telephone conference with Minerva Machado; draft, review and revise motion for class certification; review documents; review census and data base; draft attorney affidavit for class certification motion

Date: Tue Jan 28, 03

Time: 11.00

Activity: Review and organize documents; research and draft class certification motion; travel to Racine; telephone conference with Luther Riggs

Date: Wed Jan 29, 03

Time: 12.00

Activity: Prepare for and attend retiree meetings in Racine; telephone conference with Lynn Booker; telephone conference with Lonnie Henderson; telephone conference with Marvin Jarvis

Date: Thu Jan 30, 03

Time: 13.00

Activity: Review records at Local 180; travel from Racine

Date: Fri Jan 31, 03

Time: 3.75

Activity: Telephone conference with Andy Anderson; telephone conference with Tom Seymour; telephone conference with Ray Lazano; telephone conference with Jenny Hensgen; review Southaven shutdown agreement; telephone conference with Luther Riggs; telephone conference with George White; review and revise data base

Date: Sun Feb 2, 03

Time: 1.00

Activity: Draft, review and revise affidavits

Date: Mon Feb 3, 03

Time: 6.50

Activity: Telephone conferences with Gladys Yolton, Gary Halsted, Bob Betker; draft class certification affidavits; review and organize documents; draft chronology; correspondence with class representatives; oversee data entry re class members

Date: Tue Feb 4, 03

Time: 0.50

Activity: Telephone conference with Robert Geib, President Local 763; telephone conference with Lester Williams

Date: Wed Feb 5, 03

Time: 4.00

Activity: organize files, instruct staff; review correspondence

Date: Thu Feb 6, 03

Time: 1.50

Activity: Correspondence with Ms. Wemmie and Ms. Flores; telephone conference with Gladys Yolton; telephone conference with Gary Halsted; revise Halsted affidavit; telephone conference with Tom Sterak; telephone conference with Ron Fields

Date: Fri Feb 7, 03

Time: 1.25

Activity: E-mail Sherry Horton, Local 180; correspondence with Pam Kreshner, Local 807; correspondence with Virginia Davis; telephone conference with Ms. Girt; review legal developments

Date: Sun Feb 9, 03

Time: 1.00

Activity: Review documents; revise data base re St. Paul retirees

Date: Mon Feb 10, 03

Time: 6.50

Activity: Correspondence with Edward Maynard; draft Sievertson affidavit; draft Squires affidavit; review documents from Class Members; revise data base; telephone conference with Dorothy Demer; draft affidavit of Dorothy Demer; telephone conference with Mrs. Betker

Date: Tue Feb 11, 03

Time: 3.50

Activity: Telephone conference with Tom Seymour; telephone conference with Bob Betker; telephone conference with Daryl Moore; telephone conference with Darla Doty; review documents; correspondence with Tom Seymour

Date: Wed Feb 12, 03

Time: 7.00

Activity: Correspondence with Darla Clark; telephone conference with Mike McLaughlin and Mike McGonigle from Local 763; telephone conference with McLaughlin; review records; telephone conference with Wilber Montgomery; telephone conference with Ralph Gaeto (2); telephone conference with Holiday Inn; telephone conference with Connie Squire; draft letter to St. Paul retirees; draft letter to Hinsdale retirees; prepare questionnaires; oversee mailing to St. Paul and Hinsdale class members; correspondence with Mike McLaughlin; telephone conference with Daryl Moore

Date: Thu Feb 13, 03

Time: 4.00

Activity: Telephone conference with Connie Squire; draft Squire Affidavit; review and revise database; correspondence with Ms. Squires; revise Sievertsen affidavit; correspondence with Jerry Sievertson; revise Demer affidavit

Date: Fri Feb 14, 03

Time: 6.00

Activity: Draft Affidavit of Daryl Moore; draft affidavit of Darla Clark; draft affidavit of Margaret Roberts; revise affidavit of Dorothy Demer; correspondence with Ms. Demer; correspondence with Ms. Roberts; correspondence with Daryl Moore; review documents re entry into Summation

Date: Sun Feb 16, 03

Time: 3.50

Activity: Telephone conference with Ray Lozano; draft Lozano affidavit; prepare class certification motion for filing; review Local 807 documents

Date: Tue Feb 18, 03

Time: 8.00

Activity: Finalize Motion for Class Certification; correspondence with clerk; review documents and data base; travel to St. Paul

Date: Wed Feb 19, 03

Time: 12.00

Activity: Attend meeting of St. Paul retirees; travel to Chicago; attend meeting with Hinsdale retirees; travel to Detroit

Date: Mon Feb 24, 03

Time: 1.50

Activity: Correspondence with Darla Clark; telephone conference with Jo Ann Peperak; review documents; draft questionnaire for class members without a plant designation

Date: Tue Feb 25, 03

Time: 5.25

Activity: Draft questionnaire and letter to class members; oversee mailing; telephone conference with John Setty; review documents from class members; revise Affidavits; draft and revise Requests for Production of Documents; review Clement Devine's deposition testimony; correspondence with attorneys Ankers and Kienbaum

Date: Wed Feb 26, 03

Time: 1.00

Activity: Organize documents from St. Paul and Hinsdale

Date: Thu Feb 27, 03

Time: 1.25

Activity: Telephone conference with attorney Kienbaum (several times); correspondence with Kienbaum; review and organize documents and document recording procedures

Date: Fri Feb 28, 03

Time: 0.50

Activity: Review returned questionnaires

Date: Sat Mar 1, 03

Time: 1.25

Activity: Review and organize documents produced by Class Members

Date: Sun Mar 2, 03

Time: 1.00

Activity: Organize file and documents; review and revise Clark Affidavit

Date: Mon Mar 3, 03

Time: 9.50

Activity: Telephone conference with Ron Hopson; draft, review and revise class member Affidavits re preliminary injunction (several); correspondence with several class members re Affidavits; telephone conference with Darla Clark; telephone conference with Daryl Moore; review and revise Clark Affidavit

Date: Tue Mar 4, 03

Time: 2.75

Activity: Telephone conference with Jerry Sievertsen; revise Sievertsen Affidavit; correspondence with Sievertsen; correspondence with Margaret Roberts; review Insurance Agreements; draft Brief in Support of Motion for Preliminary Injunction; review files re affidavits; organize copying of class member documents

Date: Wed Mar 5, 03

Time: 6.25

Activity: Telephone conference with Connie Squire; revise Squire Affidavit; draft Britcher Affidavit; review questionnaires; review class member documents; correspondence with Marie Coulton; draft form correspondence re return of records; correspondence with Ms. Squire; correspondence with Ms. Zuhn; telephone conference with Daryl Moore; revise Moore Affidavit

Date: Thu Mar 6, 03

Time: 5.00

Activity: Telephone conference with Saggau; correspondence with Saggau; telephone conference with Barbara Hansen; draft Hansen Affidavit; telephone conference with Henry and Betty Britcher; draft Britcher Affidavit; review documents; correspondence with Daryl Moore; telephone conference with deceased retiree's daughter

Date: Fri Mar 7, 03

Time: 7.00

Activity: Telephone conference with Darla Clark; telephone conference with Wilma Gentry; telephone conference with Shirley Ewell; draft Ewell Affidavit; draft, review and revise Gentry Affidavit; correspondence with Betty Britcher; correspondence with Shirley Ewell; correspondence with Wilma Gentry; correspondence with Barbara Hansen; review documents; review questionnaires

Date: Sat Mar 8, 03

Time: 5.50

Activity: Organize file; review documents re preliminary injunction motion; draft Johnson, Vaughn and Harmon Affidavits; correspondence with Ms. Benson

Date: Sun Mar 9, 03

Time: 5.00

Activity: Draft Brief in Support of Motion for Preliminary Injunction

Date: Mon Mar 10, 03

Time: 11.00

Activity: Draft Brief in Support of Motion for Preliminary Injunction; telephone conference with Darla Clark; correspondence with Darla Clark; telephone conference with Bill Humphrey; telephone conference with Barbara Horsley; telephone conference with Edward Johnson (twice); draft Johnson Affidavit; telephone conference with Rosine Harmon; correspondence with Ms. Harmon; telephone conference with attorney Ankers; telephone conference with Jerry Sievertsen; telephone conference with Ferne Hay; revise Hay Affidavit; correspondence with Ms. Hay; correspondence with Mr. Johnson; telephone conference with Evelyn Corey; revise Corey Affidavit; correspondence with Ms. Corey; review documents

Date: Tue Mar 11, 03

Time: 10.00

Activity: Telephone conference with Elsie Teas; organize documents; telephone conference with Betty Jacobs; telephone conference with Marvin Jacobs; revise Jacobs Affidavit; correspondence with Mr. Jacobs; telephone conference with Lozano; revise Lozano Affidavit; correspondence with Lozano; telephone conference with Barbara Horsely; revise Horsley Affidavit; correspondence with Horsley; telephone conference with Darla Clark; revise Clark Affidavit; correspondence with Ms. Clark; telephone conference with Ms. Valle; revise Valle Affidavit; correspondence with Ms. Valle; telephone conference with Donald Stifter; telephone conference with Ms. McBroom; telephone conference with Mr. Castillo

Date: Wed Mar 12, 03

Time: 10.00

Activity: Telephone conference with Margaret Roberts; telephone conference with Ron Hitt; telephone conference with Mary Cox; telephone conference with Dorothy Demer; revise Cox Affidavit; draft Castillo Affidavit; draft Vaughn Affidavit; correspondence with Ms. Vaughn; draft Brief in Support of Motion for Preliminary Injunction; review documents; draft McBroom Affidavit; correspondence with Ms. Demer

Date: Thu Mar 13, 03

Time: 8.50

Activity: Draft Stifter Affidavit; correspondence with Stifter; telephone conference with Ms. Britcher; telephone conference with Ms. Hansen (twice); revise Hansen Affidavit; correspondence with Ms. Hansen; correspondence with Sandy Gentile, Kirkland & Ellis; telephone conference with Rosine Harmon; revise Harmon Affidavit; correspondence with Ms. Harmon; telephone conference with Wilma Gentry; telephone conference with Edward Johnson; revise Johnson Affidavit; correspondence with Mr. Johnson; telephone conference with Mary Cox; revise Cox Affidavit; correspondence with Ms. Cox; telephone conference with Fern Hay; revise Hay Affidavit; correspondence with Ms. Hay; telephone conference with Shirley Ewell; revise Ewell Affidavit; correspondence with Ms. Ewell; review documents

Date: Fri Mar 14, 03

Time: 9.25

Activity: Draft Brief in Support of Motion for Preliminary Injunction; telephone conference with Ms. Bentler; revise Bentler Affidavit; telephone conference with Shirley Ewell; revise Ewell Affidavit; correspondence with Ms. Ewell; telephone conference with Don Stifter; revise Stifter Affidavit; correspondence with Mr. Stifter; telephone conference with Fern Hay; correspondence with Ms. Hay; telephone conference with Brenda McBroom; revise McBroom Affidavit; correspondence with Ms. McBroom; revise Castillo Affidavit; correspondence with Ms. Castillo; telephone conference with Ms. Gentry; revise Gentry Affidavit; correspondence with Ms. Gentry

Date: Sat Mar 15, 03

Time: 7.00

Activity: Research and draft Brief in Support of Motion for Preliminary Injunction; telephone conference with Ms. Bentler; correspondence with Ms. Bentler; review and revise Britcher Affidavit; correspondence with Ms. Britcher; review returned Questionnaires

Date: Sun Mar 16, 03

Time: 3.75

Activity: Research, draft, review and revise Brief in Support of Motion for Preliminary Injunction; telephone conference with Charles Colley; telephone conference with Robert Lacke; telephone conference with Dave Ehrick; telephone conference with Ruth Draeger

Date: Mon Mar 17, 03

Time: 11.00

Activity: Draft, review and revise Brief in Support of Motion for Preliminary Injunction; telephone conference with Ms. McBroom, Ms. Castillo, Mr. Stifter, Mr. Colley, Ms. Cox and Bonnie Nelson; revise Affidavits on Cox, McBroom, Stifter, Castillo and Colley; correspondence with Cox, McBroom, Stifter, Castillo and Colley; review Hamilton videotape; telephone conference with Irene Vaughn; revise Vaughn Affidavit; correspondence with Ms. Vaughn

Date: Tue Mar 18, 03

Time: 11.50

Activity: Telephone conference with Darla Clark; revise Clark Affidavit; correspondence with Clark; review documents; draft, review and revise Brief in Support of Motion for Preliminary Injunction

Date: Wed Mar 19, 03

Time: 12.50

Activity: Telephone conferences with Darla Clark, Donald Stifter, Wilma Gentry, Shirley Ewell and Irene Vaughn; draft, review and revise Motion for Preliminary Injunction and Brief in Support; telephone conference with Ms. Nettles

Date: Fri Mar 21, 03

Time: 0.25

Activity: Telephone conference with attorney Kienbaum

Date: Tue Mar 25, 03

Time: 9.00

Activity: Telephone conference with attorney Kienbaum (twice); telephone conference with Bill Humphrey; telephone conference with Kevin, Vice-President at Local 180; correspondence with affiants; correspondence with Local Union Presidents; correspondence with Saggau; correspondence with Class Plaintiffs; review El Paso's Answer; review Case's Motion to Dismiss; review documents

Date: Wed Mar 26, 03

Time: 7.00

Activity: Review and organize documents; telephone conference with attorney Brian Sieve; telephone conference with Kienbaum

Date: Thu Mar 27, 03

Time: 8.00

Activity: Telephone conference with clerk; telephone conference with attorney Kienbaum; research re Motion to Dismiss; review and organize documents; telephone conference with Steve Elliott

Date: Fri Mar 28, 03

Time: 8.25

Activity: Correspondence with Steve Elliott; correspondence with attorney Kienbaum; correspondence with attorney Sieve; research re continuation of contractual obligations; review and organize documents; telephone conference with Teresa at attorney Anker's office; correspondence with attorney Joslin; draft Second Request for Production of Documents

Date: Sat Mar 29, 03

Time: 6.00

Activity: Review and organize documents

Date: Sun Mar 30, 03

Time: 0.75

Activity: Organize documents

Date: Mon Mar 31, 03

Time: 1.75

Activity: Telephone conference with Mike Saggau; review and organize documents; telephone conference with Elsie Teas

Date: Tue Apr 1, 03

Time: 2.00

Activity: Telephone conference with attorney Kienbaum; telephone conference with Marilyn, Judge Duggan's clerk; organize and review documents; review correspondence from Case's attorney

Date: Wed Apr 2, 03

Time: 2.25

Activity: Telephone conference with John Setty; review documents; send documents to copy service; correspondence with attorney Kienbaum

Date: Thu Apr 3, 03

Time: 1.50

Activity: Review records re FAS 106 letter; correspondence with Saggau; correspondence with attorneys Kienbaum and Joslin

Date: Fri Apr 4, 03

Time: 0.50

Activity: Review file re UAW deposition witness; review and organize documents

Date: Sat Apr 5, 03

Time: 7.25

Activity: Conference with Sam McKnight and Phil Cabrerros; review documents; enter information into Summation

Date: Sun Apr 6, 03

Time: 1.00

Activity: Review documents; enter document information to database program

Date: Mon Apr 7, 03

Time: 6.00

Activity: Draft Response to Motion to Dismiss; telephone conference with attorney Kienbaum

Date: Tue Apr 8, 03

Time: 6.00

Activity: Draft, review and revise Response to Motion to Dismiss; prepare for and attend scheduling conference; review documents

Date: Wed Apr 9, 03

Time: 9.75

Activity: Correspondence with attorney Goldstein; correspondence with attorney Joslin; review documents; telephone conference with Kienbaum; review documents

Date: Thu Apr 10, 03

Time: 7.50

Activity: Review documents; correspondence with Kienbaum and Ankers

Date: Fri Apr 11, 03

Time: 8.50

Activity: Review and organize documents

Date: Sun Apr 13, 03

Time: 6.25

Activity: Review Kienbaum and Saggau correspondence; review and organize documents

Date: Mon Apr 14, 03

Time: 9.50

Activity: Telephone conference with Tom Peters, Local 1304; research and draft Response to Motion to Dismiss; review and organize documents re UAW witness depositions; telephone conference with Annie Howe

Date: Tue Apr 15, 03

Time: 10.50

Activity: Telephone conference with Sandra Gentile; correspondence with Ms. Gentile; review and organize documents re witness depositions; draft, review and revise Response to Motion to Dismiss; research class certification issue; telephone conference with Ellen Schultz re criminal liability

Date: Wed Apr 16, 03

Time: 9.50

Activity: Review and organize documents; enter information into database; correspondence with retirees; draft retiree questionnaire

Date: Thu Apr 17, 03

Time: 0.50

Activity: Research class certification issues

Date: Fri Apr 18, 03

Time: 0.75

Activity: Review correspondence from attorney Joslin; review documents

Date: Mon Apr 21, 03

Time: 4.25

Activity: Telephone conference with Bill Jones; review and revise Response to Motion to Dismiss

Date: Tue Apr 22, 03

Time: 1.50

Activity: Draft, review and revise Brief in Response to Motion to Dismiss; review documents

Date: Wed Apr 23, 03

Time: 1.50

Activity: Telephone conference with Skip Pauley; research securities fraud; review documents

Date: Thu Apr 24, 03

Time: 0.75

Activity: Review returned questionnaires

Date: Fri Apr 25, 03

Time: 4.25

Activity: Review documents; telephone conference with Bill Humphrey; telephone conference with Tom Seymour

Date: Mon Apr 28, 03

Time: 8.00

Activity: Review and Organize documents

Date: Tue Apr 29, 03

Time: 5.25

Activity: Telephone conference with David Coleman; review documents; research; review correspondence from Case's counsel

Date: Wed Apr 30, 03

Time: 8.75

Activity: Correspondence with Nancy Nelson; correspondence with Plaintiffs; telephone conference with John Valko and Jeff Vassh; telephone conference with Ms. DeLuna; telephone conference with attorneys Kienbaum and Goldstein (two); research and draft Response to Motion to Dismiss

Date: Thu May 1, 03

Time: 9.25

Activity: Correspondence with Tom Seymour; correspondence with Kevin Johnson, Local 807; correspondence with attorney Sieve; research and revise Response to Motion to Dismiss

Date: Fri May 2, 03

Time: 4.50

Activity: Draft, review and revise Brief in Opposition to Motion to Dismiss; correspondence with Douglas Maxwell; correspondence with attorneys; correspondence with clerk; telephone conference with Darla Clark

Date: Sat May 3, 03

Time: 4.00

Activity: Research re privacy issues; research re work product privilege; draft correspondence to Sieve; telephone conference with Daryl Moore; telephone conference with Gary Halsted

Date: Sun May 4, 03

Time: 2.50

Activity: Telephone conference with Jerry Sievertsen; review documents requests and discovery materials; revise letter to attorney Sieve

Date: Mon May 5, 03

Time: 5.25

Activity: Telephone conference with Elsie Teas; telephone conference with Maynard; telephone conference with Yolton; telephone conference with Betker; telephone conference with Montgomery; telephone conference with Halsted; meet with Reese and Cabrerros; conference call with Sieve, Goldstein and Kienbaum; correspondence with class representatives

Date: Tue May 6, 03

Time: 2.00

Activity: Telephone conference with attorney Gary Francis; telephone conference with Gladys Yolton; correspondence with Wilbur Montgomery; telephone conference with Gary Halsted; telephone conference with Elsie Teas; review documents

Date: Wed May 7, 03

Time: 9.00

Activity: Review and input documents; conference call with attorneys Sieve, Kienbaum, Saggau, McKnight, Sale; telephone conference with Jerry Sievertsen; telephone conference with Daryl Moore; review correspondence; research law on discovery responses

Date: Thu May 8, 03

Time: 9.25

Activity: Telephone conference with Gladys Yolton; draft Responses to Request for Production of Documents; review Requests to Admit; telephone conference with Darla Clark; review documents in preparation of depositions

Date: Fri May 9, 03

Time: 10.25

Activity: Telephone conference with Tom Seymour; correspondence with opposing counsel; review documents and prepare for depositions; review retiree census

Date: Sat May 10, 03

Time: 5.75

Activity: Review documents; research re work product; draft Brief in Support of Motion for Protective Order

Date: Mon May 12, 03

Time: 10.00

Activity: Telephone conference with Mike Nicholson; telephone conference with attorney Goldstein; research and draft Memorandum in Support of Motion to Quash and for Protective Order; deposition preparation with Mrs. Yolton; telephone conference with Mary Cox

Date: Tue May 13, 03

Time: 10.50

Activity: Telephone conference with Elsie Teas; telephone conference with Gary Halsted; telephone conference with Sievertsen (twice); telephone conference with Bonnie Nelson; correspondence with Wilbur Montgomery; telephone conference with Mike Saggau; draft, review and revise Motion to Quash and Brief in Support; telephone conference with Sandra Moore

Date: Wed May 14, 03

Time: 15.50

Activity: Travel to Moline; review records at Local 1304; prepare Teas and Halsted for depositions; conference with Bonnie Nelson; prepare Jerry Sievertsen for deposition; review Sievertsen records

Date: Thu May 15, 03

Time: 13.00

Activity: Review Local 1304 records; conference with Dick Sanders; review Sievertsen documents; prepare Sievertsen for deposition; conference with Dean Prine; telephone conference with Andy Anderson

Date: Fri May 16, 03

Time: 12.00

Activity: Attend Sievertsen deposition; travel to Detroit

Date: Sat May 17, 03

Time: 1.75

Activity: Telephone conference with Wilbur Montgomery; review documents; prepare for Haas dep

Date: Sun May 18, 03

Time: 3.00

Activity: Review Case documents; prepare for Wilbur Montgomery deposition

Date: Mon May 19, 03

Time: 7.00

Activity: Telephone conference with Ed Maynard; telephone conference with attorney Goldstein; telephone conference with Darla Clark; deposition preparation with Jack Reese; telephone conference with John Setty; prepare for Clark deposition

Date: Tue May 20, 03

Time: 12.00

Activity: prepare for Clark deposition; travel to Dallas; meet with Darla Clark; draft protective order

Date: Wed May 21, 03

Time: 12.00

Activity: prepare for and attend Darla Clark deposition; draft protective order; travel from Detroit

Date: Thu May 22, 03

Time: 2.00

Activity: Telephone conference with Ms. Bretcher; telephone conference with attorney Stephanie Claire; telephone conference with attorney Goldstein; review file; prepare documents for Atwood deposition; review and revise protective order

Date: Fri May 23, 03

Time: 7.25

Activity: Review and revise protective order; draft stipulation for entry of order; correspondence with attorney Goldstein; review and organize file; telephone conference with Bill Humphrey; telephone conference with clerk; correspondence with

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Date: Sat May 24, 03

Time: 6.50

Activity: Review documents; input document information into database; review requests to admit

Date: Sun May 25, 03

Time: 8.25

Activity: Review UAW documents; input information into database; review and revise responses to requests to admit

Date: Tue May 27, 03

Time: 11.00

Activity: Telephone conference with Stephanie Goldstein; telephone conference with Mike Nicholson (twice); telephone conference with John Vassh (twice); telephone conference with Bill Humphrey; telephone conference with Daryl Moore; correspondence with Brian Sieve; conference with Alan Reinstein; review UAW documents; prepare for Haas deposition

Date: Wed May 28, 03

Time: 10.50

Activity: Correspondence with Stephanie Goldstein; correspondence with Sandra Gentile; telephone conference with Kevin Johnson; telephone conference with Andy Anderson; telephone conference with Mike Nicholson; review documents; prepare for Haas and Moore depositions; draft Answers to Requests to Admit

Date: Thu May 29, 03

Time: 15.00

Activity: Prepare for Haas deposition; telephone conference with Sandra Gentile; review Response to Motion for Protective Order; draft Protective Order; correspondence with Goldstein and Nomenelli; telephone conference with Daryl Moore; travel to Chicago

Date: Fri May 30, 03

Time: 16.00

Activity: Prepare for and attend Haas deposition; conference with Daryl Moore

Date: Sat May 31, 03

Time: 12.00

Activity: Attend Moore deposition; travel to Detroit

Date: Mon Jun 2, 03

Time: 15.00

Activity: Review and revise Answers to Requests for Admission; review Case's Reply in Support of Motion to Dismiss; prepare for Camarillo deposition; travel to Houston

Date: Tue Jun 3, 03

Time: 17.00

Activity: Prepare for and attend Camarillo deposition; draft Supplemental Brief re Motion to Dismiss; prepare for oral argument on Motion to Dismiss; travel from Houston

Date: Wed Jun 4, 03

Time: 8.50

Activity: Telephone conference with attorney Kienbaum; telephone conference with Mike Saggau; telephone conference with attorney Taylor; review changes to Protective Order; draft, review and revise Supplemental Brief; correspondence with counsel; prepare for oral argument; review El Paso's Brief re Motion to Dismiss

Date: Thu Jun 5, 03

Time: 9.50

Activity: Research, prepare for and attend hearing on Motion to Dismiss; review and revise Protective Order; correspondence with attorneys Goldstein and Nomenelli; correspondence with Elsie Teas; review documents

Date: Fri Jun 6, 03

Time: 1.25

Activity: Prepare for Crist deposition; correspondence with class plaintiffs

Date: Sun Jun 8, 03

Time: 6.50

Activity: Prepare for Crist deposition; prepare for Cabrereros deposition

Date: Mon Jun 9, 03

Time: 8.75

Activity: Revise Protective Order and Stipulation; correspondence with attorneys Goldstein and Nomenelli; review East Moline documents; prepare for Crist deposition

Date: Tue Jun 10, 03

Time: 15.00

Activity: Telephone conference with Andy Anderson; review documents; prepare for Crist deposition; travel to Racine; telephone conference with Jerry Sievertsen

Date: Wed Jun 11, 03

Time: 14.00

Activity: Prepare for and attend Crist deposition; travel to Chicago

Date: Thu Jun 12, 03

Time: 14.00

Activity: Travel to Davenport; review Hunt v. Case file in Rock Island; conference with Andy Anderson to prepare for deposition; telephone conferences with JAS and JRC re newly produced UAW documents

Date: Fri Jun 13, 03

Time: 13.00

Activity: Prepare for and attend Anderson deposition; travel to Detroit

Date: Mon Jun 16, 03

Time: 14.00

Activity: Draft, review and revise Responses to Requests for Admissions; draft, review and revise Answers to Interrogatories; correspondence with counsel (several); telephone conference with attorney Goldstein; review deposition transcripts; telephone conference with attorney Nomenelli

Date: Tue Jun 17, 03

Time: 7.25

Activity: Correspondence with attorneys Goldstein and Nomenelli; correspondence with Ed Maynard; correspondence with Gentile; correspondence with Sievertsen; telephone conference with Dennis Galloway; telephone conference with Mr. Conner; review documents; prepare Supplemental Answers to Interrogatories; review El Paso's Responses to Requests to Admit and Answers to Interrogatories

Date: Wed Jun 18, 03

Time: 10.50

Activity: Correspondence with attorney Sieve (several times); prepare privilege log; draft Supplemental Answers to Interrogatories; review documents; telephone conference with Andy Anderson; review Case's Answers to El Paso's Interrogatories

Date: Thu Jun 19, 03

Time: 6.50

Activity: Telephone conference with attorney Goldstein; correspondence with attorney Sieve; review correspondence; draft Supplemental Answers to Interrogatories; draft privilege log; prepare class lists; prepare witness lists; telephone conference with Mike Nicholson; review Answer and Cross Claim

Date: Mon Jun 23, 03

Time: 10.00

Activity: Telephone conference with Jerry Sievertsen; correspondence with Goldstein and Nomenelli; review documents from Case; review and revise Reply Brief in Support of Motion to Quash; correspondence with attorney Sieve; draft Hewitt Subpoena

Date: Tue Jun 24, 03

Time: 10.00

Activity: Correspondence with attorneys Goldstein and Nomenelli; correspondence with Hewitt's counsel; telephone conference with Hewitt legal department; draft Hewitt Subpoena; review documents; draft letters to retirees and surviving spouses

Date: Wed Jun 25, 03

Time: 11.25

Activity: Review documents for production; correspondence with Sandra Gentile (two) re discovery; prepare for hearing on Motion to Quash; correspondence with retirees and surviving spouses (several); prepare questionnaire mailing to retirees and surviving spouses

Date: Thu Jun 26, 03

Time: 6.75

Activity: Prepare for and attend hearing on Motion to Quash in Flint; telephone conference with attorney Goldstein; telephone conference with Alan Reinstein; review correspondence from Company counsel; review Case's Responses to El Paso's Requests to Admit; telephone conference with Ms. Lozano; telephone conference with Evelyn Jones, Dennis Williams' secretary

Date: Fri Jun 27, 03

Time: 7.25

Activity: Research re work product; review correspondence from attorney Taylor; research and draft Reply re class certification

Date: Sat Jun 28, 03

Time: 5.00

Activity: Draft, review and revise Reply in Support of Motion for Class Certification

Date: Sun Jun 29, 03

Time: 3.75

Activity: Draft, review and revise Reply in Support of Motion for Class Certification; prepare for Haas deposition

Date: Mon Jun 30, 03

Time: 9.25

Activity: Telephone conference with Lisa Muir, Hewitt; draft, review and revise Reply re Motion for Class Certification; prepare for Haas deposition

Date: Tue Jul 1, 03

Time: 14.00

Activity: Draft, review and revise Reply re class certification; prepare for Haas deposition; travel to Chicago; correspondence with counsel re subpoena

Date: Wed Jul 2, 03

Time: 15.00

Activity: Prepare for and attend Haas deposition in Chicago; travel to Detroit

Date: Thu Jul 3, 03

Time: 8.00

Activity: Draft, review and revise correspondence to attorney Sieve re briefing schedule; correspondence with attorney Ankers; review Case's supplemental submission; draft, review and revise Reply to supplemental submission re Motion for Protective Order

Date: Sat Jul 5, 03

Time: 7.50

Activity: Review file re discovery; research, draft, review and revise Response to Case re discovery

Date: Mon Jul 7, 03

Time: 8.00

Activity: Research, draft, review and revise letter to attorney Taylor re discovery; correspondence with Taylor re supplemental submission; correspondence with Taylor re subpoena; review returned Questionnaires; organize file

Date: Tue Jul 8, 03

Time: 8.00

Activity: Draft, review and revise Reply in Support of Motion for Class Certification; review documents; correspondence with class members (several); review class data base

Date: Wed Jul 9, 03

Time: 9.50

Activity: Telephone conference with attorney Forrest; telephone conference with attorney Kienbaum; review documents and input information into database; organize file

Date: Thu Jul 10, 03

Time: 10.00

Activity: Draft, review and revise Reply in Support of Motion for Class Certification; draft letter to attorney Taylor; review documents

Date: Fri Jul 11, 03

Time: 4.25

Activity: Telephone conference with Elsie Teas; review and revise correspondence with attorney Taylor; review file

Date: Mon Jul 14, 03

Time: 6.00

Activity: Telephone conference with Sandra Gentile; telephone conference with Patricia Sackmaster; correspondence with Sieve; review data base; draft, review and revise Class Certification Reply Brief; organize documents; review Haas deposition

Date: Tue Jul 15, 03

Time: 5.00

Activity: Telephone conference with attorney Lisa Muir, Hewitt; correspondence with Ms. Muir; review documents re Hewitt; review letter from attorney Sieve; draft Supplemental Answers to Requests to Admit; review Reinstein's letter; organize file

Date: Wed Jul 16, 03

Time: 5.50

Activity: Prepare Reply re class certification for filing; correspondence with clerk; draft, review and revise Answers to Requests for Admissions; draft Response to attorney Sieve re document production

Date: Thu Jul 17, 03

Time: 10.00

Activity: Telephone conference with Saggau; correspondence with Sieve; draft, review and revise Answers to Requests for Admission; review data base; telephone conference with retirees (several); review documents

Date: Fri Jul 18, 03

Time: 8.75

Activity: Telephone conference with Jim Mahoney; telephone conference with John Setty; telephone conference with Saggau; draft, review and revise Supplemental Responses to Requests to Admit; correspondence with Sieve; correspondence with Taylor; correspondence with clerk; review database and prepare lists for review of individual files; review documents produced by Case

Date: Sun Jul 20, 03

Time: 2.75

Activity: Review database; prepare questionnaires and draft letters to newly located class members; organize file

Date: Mon Jul 21, 03

Time: 9.25

Activity: Telephone conference with James Peltier, Capel's court room deputy (twice); telephone conference with Mark Harkert; review documents produced by Case; draft Towers Perrin subpoena; draft Matkov Salzman subpoena; review database

Date: Tue Jul 22, 03

Time: 6.50

Activity: Telephone conference with court reporter; correspondence with court reporter; correspondence with Towers Perrin; review documents; revise database; correspondence with Sieve; correspondence with Gentile, paralegal; telephone conference with Lisa Muir

Date: Wed Jul 23, 03

Time: 7.00

Activity: Correspondence with counsel re subpoena; revise subpoena; review documents; review database re review of benefit files

Date: Thu Jul 24, 03

Time: 8.25

Activity: Telephone conference with Sandra Gentile (two); prepare Casstevens; prepare for document production; review and revise database

Date: Fri Jul 25, 03

Time: 17.00

Activity: Travel from Detroit to Chicago; review Burlington benefit files; travel from Chicago

Date: Mon Jul 28, 03

Time: 4.00

Activity: Travel to Chicago

Date: Tue Jul 29, 03

Time: 12.00

Activity: Review Burlington benefit files in Chicago

Date: Wed Jul 30, 03

Time: 10.25

Activity: Travel from Chicago; telephone conference with Pedro Guajardo; correspondence with Sandra Gentile; review data base; telephone conference with Alan Reinstein; research and prepare for hearing

Date: Thu Jul 31, 03

Time: 10.75

Activity: Telephone conference with Bill Humphrey; attend hearing in Flint; conference with Reinstein; review documents from Case; revise data base

Date: Fri Aug 1, 03

Time: 5.00

Activity: Telephone conference with Dick Sanders; telephone conference with Gary Halsted; review data base; prepare census for expert; research re preliminary injunction issue

Date: Mon Aug 4, 03

Time: 7.00

Activity: Review El Paso's Response to Motion for Preliminary Injunction; review Case's Motion for Preliminary Injunction; telephone conference with paralegal Sandra Gentile; review documents re Reply Brief; review data base in preparation for reviewing benefit files

Date: Tue Aug 5, 03

Time: 6.00

Activity: Telephone conference with Sandra Gentile; review documents; travel to Chicago

Date: Wed Aug 6, 03

Time: 12.00

Activity: Review benefit files in Chicago

Date: Thu Aug 7, 03

Time: 12.50

Activity: Review benefit files in Chicago

Date: Fri Aug 8, 03

Time: 13.50

Activity: Review benefit files in Chicago; travel to Detroit

Date: Mon Aug 11, 03

Time: 7.00

Activity: Review Case's Response; research and draft Reply; telephone conference with Mike Nicholson

Date: Tue Aug 12, 03

Time: 10.25

Activity: Telephone conference with John Setty; research and draft Reply Brief; telephone conference with attorney Ilene Grant from Hewitt

Date: Wed Aug 13, 03

Time: 10.00

Activity: Review Nomellini letter; review correspondence and pleadings; correspondence with Nomellini re production of documents; draft and dictate Reply Brief

Date: Thu Aug 14, 03

Time: 6.00

Activity: Correspondence with attorney Nomellini re discovery; research and draft Reply Brief

Date: Fri Aug 15, 03

Time: 3.00

Activity: Research and draft Reply Brief

Date: Sat Aug 16, 03

Time: 2.75

Activity: Draft and dictate Reply Brief

Date: Sun Aug 17, 03

Time: 3.00

Activity: Research and draft Reply Brief

Date: Mon Aug 18, 03

Time: 6.00

Activity: Research and draft Reply Brief; correspondence with attorney Nomellini; telephone conference with Joann Dalton

Date: Tue Aug 19, 03

Time: 9.25

Activity: Telephone conference with attorney Forrest; telephone conference with attorney Kienbaum; correspondence with attorney Taylor; research and draft Motion and Brief to Compel Production of Documents

Date: Wed Aug 20, 03

Time: 11.00

Activity: Telephone conference with attorney Forrest; correspondence with attorney Sieve; research and draft Motion to Compel and Brief in Support; review documents produced by Case form East Moline benefit files; telephone conference with Sandra Gentile

Date: Thu Aug 21, 03

Time: 5.50

Activity: Draft, review and revise Brief in Support of Motion to Compel; correspondence with attorney Sieve; correspondence with attorney Goldstein; draft proposed Protective Order

Date: Fri Aug 22, 03

Time: 7.00

Activity: Correspondence with counsel; draft and dictate Reply Brief; revise Protective Order; correspondence with attorney Taylor; telephone conference with Sandra Gentile

Date: Sun Aug 24, 03

Time: 6.00

Activity: Prepare for documents inspection; draft inspection instructions; travel to Racine

Date: Mon Aug 25, 03

Time: 12.00

Activity: Inspect benefit files; draft and revise reply brief in support of motion for preliminary injunction

Date: Tue Aug 26, 03

Time: 12.00

Activity: Inspect documents in Racine

Date: Wed Aug 27, 03

Time: 14.00

Activity: Inspect documents in Racine; draft and revise Reply Brief re preliminary injunction

Date: Thu Aug 28, 03

Time: 11.00

Activity: Inspect benefit files in Racine

Date: Fri Aug 29, 03

Time: 15.00

Activity: Inspect benefit files in Racine; travel to Detroit

Date: Tue Sep 2, 03

Time: 10.00

Activity: Draft, review and revise Reply Brief; telephone conference with Andy Anderson

Date: Wed Sep 3, 03

Time: 4.50

Activity: Draft, review and revise Reply Brief; telephone conference with Bill Humphrey;
e-mail to Valko

Date: Thu Sep 4, 03

Time: 2.75

Activity: Correspondence with Sandra Gentile; conference with Alan Reinstein; review data
re FAS 106 letter

Date: Tue Sep 9, 03

Time: 11.00

Activity: Draft, review and revise Reply Brief; telephone conference with Elsie Teas;
telephone conference with Reinstein; review correspondence from El Paso to Case
re discovery

Date: Thu Sep 11, 03

Time: 11.00

Activity: Research and draft Reply Brief; telephone conference with Sandra Gentile;
telephone conference with attorney Kienbaum; telephone conference with John
Setty; telephone conference with Andy Anderson

Date: Fri Sep 12, 03

Time: 10.00

Activity: Research, draft, review and revise Reply Brief

Date: Sat Sep 13, 03

Time: 7.50

Activity: Draft, review and revise Reply Brief

Date: Sun Sep 14, 03

Time: 11.00

Activity: Draft, review and revise Reply Brief; travel to Chicago

Date: Mon Sep 15, 03

Time: 10.75

Activity: Travel from Chicago to Milwaukee; review benefit files

Date: Tue Sep 16, 03

Time: 10.00

Activity: Review benefit files; telephone conference with attorney Taylor

Date: Wed Sep 17, 03

Time: 12.00

Activity: Travel to Racine; review benefit files

Date: Thu Sep 18, 03

Time: 10.50

Activity: Review benefit files in Racine and Milwaukee

Date: Fri Sep 19, 03

Time: 12.00

Activity: Review benefit files in Milwaukee; travel from Milwaukee to Detroit

Date: Mon Sep 22, 03

Time: 5.25

Activity: Telephone conference with Andy Anderson; telephone conference with Jerry Sievertsen; correspondence with attorney Taylor; revise Protective Order; review document production lists; organize file

Date: Tue Sep 23, 03

Time: 0.25

Activity: Correspondence with attorney Taylor

Date: Thu Sep 25, 03

Time: 0.50

Activity: Telephone conference with Wilbur Montgomery; telephone conference with retiree re Jim Peterson

Date: Fri Sep 26, 03

Time: 2.75

Activity: Telephone conference with Perry King; correspondence with Local Presidents, Perry King, Helen Heiland, Jerry Sievertsen and Plaintiffs; telephone conference with Sandra Gentile

Date: Mon Sep 29, 03

Time: 1.75

Activity: Telephone conference with Bill Humphrey; telephone conference with Mr. Moorner; review and organize file; telephone conference with Nancy, Saggau's secretary re documents; telephone conference with reporter

Date: Tue Sep 30, 03

Time: 1.00

Activity: Correspondence with Sandra Gentile re document production; review additional documents produced by UAW

Date: Wed Oct 1, 03

Time: 0.50

Activity: Revise correspondence with Gentile

Date: Mon Oct 6, 03

Time: 15.75

Activity: Travel to Racine; inspect benefit files

Date: Tue Oct 7, 03

Time: 10.00

Activity: Inspect benefit files; telephone conference with Jeff at UAW Local 180

Date: Wed Oct 8, 03

Time: 14.50

Activity: Inspect benefit files; telephone conference with Kevin Johnson; travel to Detroit

Date: Thu Oct 9, 03

Time: 1.50

Activity: Organize file; review documents; review notice re premium contributions for 2004

Date: Fri Oct 10, 03

Time: 8.00

Activity: Telephone conference with John Setty; correspondence with Setty; correspondence with Tom Seymour; telephone conference with reporter from Burlington; review documents and document database; telephone conference with Sandra Gentile; telephone conference with Tom Knorr re microfiche reader

Date: Mon Oct 13, 03

Time: 10.50

Activity: Review document production lists; revise database; correspondence with Sandra Gentile re document production; review documents produced by Case; telephone conference with Steve Elliott, reporter; correspondence with Gentile re Reply Brief

Date: Tue Oct 14, 03

Time: 8.00

Activity: Telephone conference with Lisa Muir of Hewitt; telephone conference with Saggau; review documents; correspondence with attorney Jane McCahill of Towers Perrin; telephone conference with Tom Seymour; telephone conference with Rosalie Jorgensen

Date: Wed Oct 15, 03

Time: 13.00

Activity: Travel to Racine; inspect corporate benefit files

Date: Thu Oct 16, 03

Time: 12.00

Activity: Review benefit files in Racine; attend retiree meeting at Local 180

Date: Fri Oct 17, 03

Time: 12.00

Activity: Review benefit files in Racine; travel to Detroit

Date: Mon Oct 20, 03

Time: 9.75

Activity: Telephone conference with Jerry Sievertsen; correspondence with Sievertsen; correspondence with Sandra Gentile; e-mail to Gentile; prepare for document review in Racine; review documents and prepare various queries re document production

Date: Tue Oct 21, 03

Time: 12.00

Activity: Travel to Racine; inspect benefit files

Date: Wed Oct 22, 03

Time: 11.00

Activity: Inspect documents at Hewitt Associates in Lincolnshire, Illinois

Date: Thu Oct 23, 03

Time: 6.50

Activity: Inspect benefit files at Racine; travel to Detroit

Date: Fri Oct 24, 03

Time: 0.75

Activity: Conference with Frank Musick; review documents

Date: Mon Oct 27, 03

Time: 6.00

Activity: Telephone conference with Saggau; review documents from Hewitt; review depositions of Haas and Crist; correspondence with attorney Taylor; telephone conference with Kienbaum's office re MJ Capel's Order

Date: Tue Oct 28, 03

Time: 10.25

Activity: Review documents; draft Supplemental Brief in Support of Motion for Preliminary Injunction; correspondence with counsel; telephone conference with Helen Heiland; telephone conference with Elsie Teas; telephone conference with Jim Reynolds

Date: Wed Oct 29, 03

Time: 11.00

Activity: Review files; research and prepare for oral argument; telephone conference with Elsie Teas

Date: Thu Oct 30, 03

Time: 11.00

Activity: Prepare for and attend oral argument on motion for preliminary injunction; telephone conferences with reporters (numerous times)

Date: Fri Oct 31, 03

Time: 7.00

Activity: Organize file; telephone conference with Tom Seymour; review videotape of meetings; review documents; review document production

Date: Mon Nov 3, 03

Time: 7.00

Activity: Telephone conference with John Setty; research and draft objections to order re productions of documents

Date: Tue Nov 4, 03

Time: 4.00

Activity: Draft, review and revise objections to Order denying in part protective order; review documents

Date: Wed Nov 5, 03

Time: 10.00

Activity: Review and organize files; work of document production

Date: Thu Nov 6, 03

Time: 10.00

Activity: Review files; organize files; work on document production; telephone conference with Herb Trix

Date: Fri Nov 7, 03

Time: 3.25

Activity: Telephone conference with Dennis Galloway; correspondence with Hewitt attorney Muir; correspondence with Sandra Gentile re document production; review Case's supplemental brief

Date: Tue Nov 11, 03

Time: 1.50

Activity: Research reply brief

Date: Wed Nov 12, 03

Time: 9.25

Activity: Research, draft and revise reply brief

Date: Thu Nov 13, 03

Time: 5.75

Activity: Draft, review and revise response to post hearing brief; correspondence with counsel for Defendants

Date: Fri Nov 14, 03

Time: 1.50

Activity: Organize file; telephone conference with McCahill, attorney for Towers Perrin

Date: Mon Nov 17, 03

Time: 3.00

Activity: Organize file re document production; review Kienbaum letter

Date: Tue Nov 18, 03

Time: 5.50

Activity: Telephone conference with Kienbaum; correspondence with Kienbaum; review brief; organize file re document production; telephone conference with Lisa Muir, Hewitt's attorney; correspondence with Ms. Muir; telephone conference with Manny Vargas, 24/7 copying service re Hewitt documents; correspondence with Mr. Vargas

Date: Wed Nov 19, 03

Time: 5.00

Activity: Draft, review and revise reply to El Paso's post hearing brief; review Case's response to Plaintiffs' objections

Date: Thu Nov 20, 03

Time: 2.75

Activity: Telephone conference with Jerry Sievertsen; review documents from Hewitt; correspondence with Tom Kienbaum; telephone conference with court clerk; research re service of orders; review Case's response to objections

Date: Fri Nov 21, 03

Time: 5.00

Activity: Draft Motion to Close Record; review Case's brief

Date: Sun Nov 23, 03

Time: 8.00

Activity: Draft, review and revise response to Case second post hearing brief

Date: Mon Nov 24, 03

Time: 6.00

Activity: Draft, review and revise response brief; draft motion to close record; correspondence with counsel

Date: Wed Nov 26, 03

Time: 9.00

Activity: Draft, review and revise Reply in Support of Objections; review Order re Objections; review class members' statements

Date: Fri Nov 28, 03

Time: 6.00

Activity: Correspondence with class representatives; correspondence with Local Unions; correspondence with Sievertsen; correspondence with King; correspondence with Saggau; review documents

Date: Tue Dec 2, 03

Time: 0.50

Activity: Telephone conference with attorney Kienbaum; correspondence with attorney Taylor

Date: Wed Dec 3, 03

Time: 0.75

Activity: Telephone conference with Local 807 President Johnson; correspondence with President Johnson; correspondence with Andy Anderson

Date: Fri Dec 5, 03

Time: 4.00

Activity: Review documents for production; draft Motion for Reconsideration

Date: Sun Dec 7, 03

Time: 7.50

Activity: Draft Motion for Reconsideration

Date: Mon Dec 8, 03

Time: 11.00

Activity: Research, draft, review and revise Motion for Reconsideration; review returned forms and questionnaires; review document production

Date: Tue Dec 9, 03

Time: 11.00

Activity: Review questionnaires; prepare privilege log

Date: Wed Dec 10, 03

Time: 7.00

Activity: Review documents and questionnaire responses; prepare privilege log

Date: Thu Dec 11, 03

Time: 6.50

Activity: Review documents; review files; review questionnaires; draft, review and revise privilege log

Date: Fri Dec 12, 03

Time: 9.50

Activity: Review documents; review questionnaires; draft, review and revise privilege log; correspondence with Case attorney Taylor; review individual files re documents

Date: Mon Dec 15, 03

Time: 9.00

Activity: Telephone conference with Joyce Bentler; review class member files; prepare list of uncopied documents

Date: Tue Dec 16, 03

Time: 6.75

Activity: Correspondence with Case attorney Taylor; review and revise document database; review individual benefit files; correspondence with Hewitt attorney Muir; review documents; correspondence with Towers Perrin attorney McCahill

Date: Wed Dec 17, 03

Time: 10.00

Activity: Telephone conference with Jennifer, Quad City Times; telephone conference with Lawrence Thomas; review critical documents

Date: Thu Dec 18, 03

Time: 9.00

Activity: Telephone conference with John Valko; telephone conference with Rosalie Jorgensen; review critical documents; revise database

Date: Fri Dec 19, 03

Time: 2.25

Activity: Telephone conference with Saggau; review document production

Date: Mon Dec 22, 03

Time: 0.25

Activity: Telephone conference with Bill Humphries

Date: Tue Dec 23, 03

Time: 0.25

Activity: Telephone conference with Herb Trix

Date: Wed Dec 24, 03

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Mon Dec 29, 03

Time: 1.75

Activity: Telephone conference with Mr. Brown; correspondence with Janet Davis; telephone conference with Jennifer, Quad City Times; review critical documents

Date: Fri Jan 2, 04

Time: 3.25

Activity: Review Opinion; telephone conference with John Setty; telephone conference with Sherrick; correspondence with Local Unions; correspondence with class representatives

Date: Sat Jan 3, 04

Time: 0.50

Activity: Review Decision; telephone conference with Joyce Bentler

Date: Mon Jan 5, 04

Time: 5.50

Activity: Telephone conference with John Valko (twice); telephone conference with Bill Humphrey; telephone conference with Elsie Teas; telephone conference with Paula Castillo; telephone conference with Mike M (Local 763); telephone conference with Bill Vallee; telephone conference with John Setty; telephone conference with Sherrick (twice); telephone conference with Roger Kerson; telephone conference with Brenda Mantz; telephone conference with Helen Heiland; telephone conference with Robert Betker; review VEBA Trust Agreement; telephone conference with Mrs. Frazier; telephone conference with Robert Price

Date: Tue Jan 6, 04

Time: 5.25

Activity: Telephone conference with attorney Kienbaum; telephone conference with Sherrick (twice); telephone conference with John Grigsby; telephone conference with Brenda Mantz; telephone conference with Ron Hitt; telephone conference with Wilbur Montgomery; telephone conference with Tom Betchkal; telephone conference with Ronald Zobrak; telephone conference with Andy Anderson; draft injunction bond; telephone conference with Annie Howell; telephone conference with Jane McCahill; telephone conference with Joyce Bentler

Date: Wed Jan 7, 04

Time: 4.00

Activity: Telephone conference with Bill Humphrey; telephone conference with John Valko; telephone conference with Kienbaum; telephone conference with Brenda Mantz (twice); telephone conference with Jan Bear; telephone conference with Arlene Bodi; telephone conference with Clara Wolfe; telephone conference with Patricia Terpstra; telephone conference with Ed Maynard; telephone conference with Mrs. Klavenga; telephone conference with Warren Larsen; correspondence with BNA; correspondence with Ron Hitt; correspondence with Daryl Moore; correspondence with Darla Clark; telephone conference with Paula Castillo

Date: Thu Jan 8, 04

Time: 5.25

Activity: Review documents for production; telephone conference with Elsie Teas; telephone conference with Jan, VEBA; telephone conference with Brenda Mantz; correspondence with Mantz; correspondence with Donna Key; telephone conference with John Setty; telephone conference with Betty Freimund; telephone conference with Rose Marie Mertens; telephone conference with Jennie Waller

Date: Fri Jan 9, 04

Time: 3.75

Activity: Telephone conference with Attorney Kienbaum; telephone conference with Perry King; review post IPO retiree data; review deceased retiree data from Local 180; telephone conference with Tony Wallace; telephone conference with Rosemary Mertens; telephone conference with Darrel Ellis; telephone conference with Dale Davis

Date: Sat Jan 10, 04

Time: 7.50

Activity: Review files re post 10/3/93 retirees

Date: Mon Jan 12, 04

Time: 5.25

Activity: Telephone conference with Brenda Mantz (twice); correspondence with attorney Kienbaum; correspondence with attorney Goldstein; telephone conference with Dick Sanders; telephone conference with Sherry Horton, Local 180; correspondence with attorney Taylor; telephone conference with John Valko; telephone conference with Jan Bair; telephone conference with Dan Sherrick; correspondence with Jan Bair; e-mail Jan Bair

Date: Tue Jan 13, 04

Time: 4.00

Activity: Telephone conference with Elsie Teas; telephone conference with John Setty; telephone conference with Dorrance Leonard; telephone conference with attorney Kienbaum; telephone conference with Jan Bair; telephone conference with Brenda Mantz; telephone conference with Margaret Wilkes; telephone conference with Walter Jarvis, Bank One; correspondence with class Plaintiffs; draft bond applications; telephone conference with attorney Kienbaum; review El Paso's Motion for Reconsideration and Motion for Stay

Date: Wed Jan 14, 04

Time: 1.00

Activity: Telephone conference with Mrs. Ratliff; telephone conference with Bill Humphrey; telephone conference with Margaret Kingery re Harry Linville; telephone conference with Gladys Yolton

Date: Thu Jan 15, 04

Time: 10.50

Activity: Telephone conference with John Valko; telephone conference with Tom Kienbaum; review documents re post 10/3/1993 retirees; correspondence with attorney Goldstein

Date: Fri Jan 16, 04

Time: 2.75

Activity: Telephone conference with Jeff Vassh; telephone conference with Walter Jarvis; telephone conference with Sherrick and Jay Whitman; e-mail Whitman; telephone conference with Lawrence Ward; telephone conference with Ms. Campbell; telephone conference with Ferne Hay; telephone conference with Walter Jarvis and Lynn Shipman; telephone conference with Ms. Zielstort; telephone conference with James Vipond; telephone conference with Sherrick; telephone conference with Sharon Turnbough; telephone conference with Angie Dakolas

Date: Sat Jan 17, 04

Time: 8.25

Activity: Draft Amendment to Trust Agreement; telephone conference with Helen Heiland; telephone conference with Sherrick (twice); telephone conference with retirees (several times); review documents re October 3, 1993 retirees; e-mail attorney Shipman and John Grigsby

Date: Mon Jan 19, 04

Time: 4.25

Activity: Telephone conference with John Setty; telephone conference with Ms Szymanski; telephone conference with Jennifer DeWitt; correspondence to Taylor; correspondence with Heiland; telephone conference with Michael Burke; review documents re pre 10/3/1993 retirees

Date: Tue Jan 20, 04

Time: 6.50

Activity: Telephone conference with Lynn Shipman; telephone conference with Brenda Mantz; telephone conference with Bill Humphrey; review documents re post 10/3/1993 retirees; telephone conference with Ken Price; telephone conference with Susan Shaffer; e-mail Susan Shaffer (twice); e-mail Sherrick; telephone conference with John Grigsby; telephone conference with James Peterson; telephone conference with Bill Humphrey; e-mail Mantz; e-mail Grigsby; review letter from Tony Wallace

Date: Wed Jan 21, 04

Time: 8.25

Activity: Telephone conference with Walter Jarvis; telephone conference with Jim Peterson; e-mail Sherrick; telephone conference with Brenda Mantz; telephone conference with Bill Humphrey; telephone conference with Jim Peterson re bond (twice); correspondence with Mantz; correspondence with Jim Reynolds; correspondence with attorney Goldstein; review and compile documents re post 10/3/1993 retirees; revise bond; draft bond application for Retired Workers Chapter

Date: Fri Jan 23, 04

Time: 5.50

Activity: Telephone conference with Walter Jarvis and Anita Goree, Bank One; telephone conference with Mike Saggau (twice); telephone conference with Sherrick; telephone conference with Bill Humphrey and Dick Sanders; telephone conference with Brenda Mantz; correspondence with Brenda Mantz; review Judge Duggan's order; draft letter to retirees; e-mail Sherrick

Date: Sat Jan 24, 04

Time: 7.50

Activity: Review file re Response to Motion for Reconsideration; correspondence with Jim Reynolds; correspondence with Class Plaintiffs (six)

Date: Sun Jan 25, 04

Time: 5.50

Activity: Research re Response to Motion for Reconsideration; review documents re corporate liability

Date: Mon Jan 26, 04

Time: 3.00

Activity: Research and draft Brief in Response to Motion for Reconsideration

Date: Tue Jan 27, 04

Time: 9.25

Activity: Telephone conference with Bill Humphrey; telephone conference with Bernadette Hite; correspondence with Brenda Mantz; telephone conference with Alicia Vega; research and draft Response to Motion for Reconsideration

Date: Wed Jan 28, 04

Time: 8.75

Activity: Telephone conference with George Santovi; telephone conference with Helen Heiland; telephone conference with Ralph Gaeto; draft letter for return of documents; research and draft Response to Motion for Reconsideration; telephone conference with Kevin Johnson; telephone conference with reporters (several times)

Date: Thu Jan 29, 04

Time: 9.75

Activity: Telephone conference with Dennis Galloway; telephone conference with Bill Humphrey; e-mail with John Grigsby; telephone conference with Kienbaum and Forrest (twice); research, draft and review Brief

Date: Fri Jan 30, 04

Time: 9.50

Activity: Draft, review and revise Brief in Response to Motion for Reconsideration; correspondence with counsel; telephone conference with Ruby Franks; telephone conference with John Valko; telephone conference with Annie Howell

Date: Sat Jan 31, 04

Time: 3.00

Activity: Organize file; review and organize critical documents

Date: Sun Feb 1, 04

Time: 1.50

Activity: Organize file; correspondence with class plaintiffs (six); correspondence with Saggau

Date: Mon Feb 2, 04

Time: 6.50

Activity: Telephone conference with Pauline Sachleben; telephone conference with Ms. Moticksko; telephone conference with Charles Taylor; telephone conference with John Gottfriedson; telephone conference with Joan Qualley re Farrells; telephone conference with Ms. Galbreath; telephone conference with Mrs. Bester; telephone conference with Walter Kroll; telephone conference with attorney Will Forrest; correspondence with Mr. Forrest; review returned envelopes; telephone conference with Ms. Lamothe; telephone conference with Wanda Gilliland; telephone conference with Mrs. Born; telephone conference with Mr. Green

Date: Tue Feb 3, 04

Time: 4.75

Activity: Correspondence with Jina Tuskiewicz; telephone conference with Glen Hohl; telephone conference with John Valko; review questionnaires and documents; review letter from El Paso attorney Massie to the Court; telephone conference with Noel Massie; organize file; telephone conference with Jeraldine A. Hiatt; telephone conference with Perry King; correspondence with Mr. King; telephone conference with Kenneth Jones

Date: Wed Feb 4, 04

Time: 1.25

Activity: Telephone conference with Herb Trix; telephone conference with Bill Humphries; telephone conference with Dan Dewitt; review file re Patternmakers; correspondence with Dewitt

Date: Thu Feb 5, 04

Time: 0.75

Activity: Correspondence with Mr. Schierel; correspondence with Sherry Horton;

Date: Fri Feb 6, 04

Time: 4.25

Activity: Review database re post 10/3/93 retirees; review documents re remaining file production; correspondence with attorney Forrest

Date: Mon Feb 9, 04

Time: 5.75

Activity: Telephone conference with Wayne Stedman; telephone conference with Rosie Hunt; review correspondence from Local 180; review documents from George Santovi; review records re document production

Date: Tue Feb 10, 04

Time: 6.75

Activity: Telephone conference with Elsie Teas; review database re unproduced files

Date: Wed Feb 11, 04

Time: 6.00

Activity: Review documents relating to file production; review documents produced by retirees; correspondence with attorney Forrest;

Date: Thu Feb 12, 04

Time: 8.50

Activity: Telephone conference with John Setty; telephone conference with Bill Humphrey; correspondence with Sherrick; review files re document production

Date: Fri Feb 13, 04

Time: 1.25

Activity: telephone conference with Maudie Bye; telephone conference with Roy Comer; telephone conference with Robert Jatczak; telephone conference with Tammy Surwic re Mrs. Henderson; telephone conference with Beverly Zielstorf

Date: Sat Feb 14, 04

Time: 2.00

Activity: Review documents produced by class members; revise letter to attorney Forrest; review file production records

Date: Sun Feb 15, 04

Time: 3.75

Activity: Review files regarding document production

Date: Mon Feb 16, 04

Time: 5.00

Activity: Review documents relating to Case's document production; telephone conference with Bill Jones; telephone conference with Ray Smith

Date: Tue Feb 17, 04

Time: 5.00

Activity: Telephone conference with Mike Hackwith; review documents re benefit file production

Date: Wed Feb 18, 04

Time: 5.75

Activity: Telephone conference with Tom Kienbaum; correspondence with Sandra Gentile; correspondence with Mr. Scheifel; review Case's Reply Brief and Response to Motion for Stay; review individual documents re Case production of documents; telephone conference with Ann Fritz of Bank One; telephone conference with Richard Mager

Date: Tue Feb 24, 04

Time: 8.25

Activity: Correspondence with Court of Appeals; draft Appearance for Court of Appeals; e-mail Saggau; correspondence with Bill Humphrey; review documents re production of benefit files

Date: Wed Feb 25, 04

Time: 8.50

Activity: Telephone conference with Meghan Duffy; correspondence with Ms. Duffy; review database re Case's document production; telephone conference with John Goodin

Date: Thu Feb 26, 04

Time: 7.00

Activity: Review briefing schedule; telephone conference with John Setty; telephone conference with Vern Green; correspondence with Perry King; telephone conference with Helen Mason; review documents re class membership; review documents re Case production; telephone conference with Jennifer Dewitt (twice); telephone conference with Herb Trix

Date: Fri Feb 27, 04

Time: 6.50

Activity: Review El Paso participant list re class eligible for coverage under injunction

Date: Sat Feb 28, 04

Time: 3.50

Activity: Review El Paso participant list re injunction coverage

Date: Mon Mar 1, 04

Time: 8.50

Activity: Review files and database re eligible class members

Date: Tue Mar 2, 04

Time: 3.00

Activity: Review and revise database re retirees covered by injunction

Date: Wed Mar 3, 04

Time: 6.50

Activity: Telephone conference with Bill Humphrey; review El Paso participant list; compare with database; prepare lists; correspondence with attorney Forrest

Date: Thu Mar 4, 04

Time: 7.75

Activity: Telephone conference with Bill Humphrey; draft, review and revise correspondence with attorney Forrest; prepare lists(several) re composition of the class and deceased class members; telephone conference with Tom Knorr re microfiche readers

Date: Fri Mar 5, 04

Time: 1.50

Activity: Telephone conference with John Setty; correspondence with Meghan Duffy, Kirkland & Ellis; telephone conference with Tom Knorr re microfiche readers; research re Motion to Dismiss Appeal

Date: Mon Mar 8, 04

Time: 14.00

Activity: Travel to Racine; inspect benefit files

Date: Tue Mar 9, 04

Time: 6.25

Activity: Inspect benefit files in Racine

Date: Wed Mar 10, 04

Time: 13.00

Activity: Travel from Milwaukee to Lincolnshire, Illinois; inspect Hewitt documents in Lincolnshire, Illinois; travel from Chicago to Detroit

Date: Thu Mar 11, 04

Time: 0.25

Activity: Telephone conference with attorney Kienbaum; telephone conference with Sherrick and Saggau; telephone conference with Roma Hall; telephone conference with Diane Butke; telephone conference with Bill Wistedt; telephone conference with Bill Humphrey; correspondence with post-IPO retirees

Date: Fri Mar 12, 04

Time: 3.25

Activity: Telephone conference with John Valko; telephone conference with Helen Heiland; telephone conference with Brenda Mantz; correspondence with attorneys for El Paso and Case (two); review documents produced by Case re injunction issues

Date: Sat Mar 13, 04

Time: 0.25

Activity: Telephone conference with Bill Wistedt

Date: Mon Mar 15, 04

Time: 1.00

Activity: Telephone conference with Helen Heiland; telephone conference with Elsie Teas; telephone conference with Bill Humphrey; telephone conference with John Setty; telephone conference with Rock Island Dispatch

Date: Tue Mar 16, 04

Time: 3.25

Activity: Prepare for and participate in mediation conference call with Kienbaum, Sieve and Mediator Charles Tobias; correspondence with attorneys for Case and El Paso; correspondence with Meghan Duffy re document production

Date: Wed Mar 17, 04

Time: 0.75

Activity: Telephone conference with Herb Trix; telephone conference with Forrest and Kienbaum; correspondence with Kienbaum

Date: Thu Mar 18, 04

Time: 4.50

Activity: Telephone conference with Wilbur Montgomery; telephone conference with John Valko; telephone conference with Gladys Yolton; review El Paso current coverage list; correspondence with attorney Forrest; correspondence with Mediator Tobias; correspondence with Saggau

Date: Mon Mar 22, 04

Time: 6.75

Activity: Telephone conference with Charles Janes; telephone conference with Dorothy Riley; telephone conference with Rose Musielak; telephone conference with Joanne Johnson; telephone conference with Gail Giampaoli; telephone conference with Kienbaum and Forrest; review El Paso coverage lists; telephone conference with Ruth Coates; telephone conference with Patricia Dykes; telephone conference with Bobbie Garth; telephone conference with Maxine Johnson; telephone conference with Jacqueline Thomas

Date: Tue Mar 23, 04

Time: 4.25

Activity: Telephone conference with John Setty; telephone conference with Bill Humphrey; correspondence with attorney Sieve; telephone conference with Saggau; telephone conference with John Greiser; review database to determine persons who terminated coverage

Date: Wed Mar 24, 04

Time: 2.25

Activity: Review database; prepare query re El Paso plan terminations; correspondence with attorney Sieve re terminated plan participants

Date: Fri Mar 26, 04

Time: 4.00

Activity: Telephone conference with attorney Forrest; telephone conference with Bill Humphrey; telephone conference with Saggau and Mark Naess; review Motion for Stay and draft Response

Date: Sat Mar 27, 04

Time: 7.50

Activity: Draft, review and revise Brief in Response to Motion for Stay

Date: Sun Mar 28, 04

Time: 3.50

Activity: Draft, review and revise Brief in Response to Motion for Stay

Date: Mon Mar 29, 04

Time: 8.25

Activity: Research, draft, review and revise Brief in Opposition to Motion for Stay; telephone conference with Sherrick and Saggau; review Motion for Bond Hearing; research re Response to Motion for Bond Hearing; telephone conference with John Valko; correspondence with Clerk; correspondence with Defendants' counsel

Date: Tue Mar 30, 04

Time: 9.50

Activity: Research, draft, revise and review Brief in Opposition to Bond Hearing; draft and revise Reynolds Affidavit; telephone conference with Humphrey and Reynolds (several times)

Date: Wed Mar 31, 04

Time: 7.25

Activity: Correspondence with Defendants' Counsel (twice); telephone conference with Saggau re Brief in Opposition to Bond Hearing; draft, review and revise Brief in Opposition to Bond Hearing

Date: Thu Apr 1, 04

Time: 2.00

Activity: Draft dependent verification form; draft letter to class re reinstatement

Date: Fri Apr 2, 04

Time: 0.75

Activity: Telephone conference with Ms. Stivers; review correspondence with Case and El Paso; revise letter to class re reinstatement

Date: Sat Apr 3, 04

Time: 1.50

Activity: Telephone conference with Mrs. Bentler; review documents

Date: Mon Apr 5, 04

Time: 1.25

Activity: Telephone conference with Bill Humphrey; correspondence with attorney Miller; prepare for settlement discussions; oversee mailing

Date: Tue Apr 6, 04

Time: 7.50

Activity: Prepare for and attend settlement discussions; telephone conference with John Valko; review El Paso lapsed coverage list

Date: Wed Apr 7, 04

Time: 7.25

Activity: Telephone conference with Tony Evreniadis; review El Paso lapsed coverage list to determine eligibility

Date: Thu Apr 8, 04

Time: 6.25

Activity: Telephone conference with John Setty; telephone conference with Ms. Carkuff; telephone conference with Mr. Herman; correspondence with Will Forrest; telephone conference with Will Forrest (several times); telephone conference with Mariel Raechal; telephone conference with Steve Dunn; telephone conference with Mrs. Boshee; telephone conference with Elena Hernandez; correspondence with Sherry Horton, Local 180

Date: Fri Apr 9, 04

Time: 3.25

Activity: Correspondence with Saggau; correspondence with attorney Will Forrest; telephone conference with Betty Britcher (twice); telephone conference with Mediator Charles Tobias; telephone conference with Richard Strawaker; review returned verification forms; telephone conference with Jack Bedwell

Date: Sat Apr 10, 04

Time: 1.50

Activity: Telephone conference with Bill Humphrey; review returned forms

Date: Mon Apr 12, 04

Time: 0.25

Activity: Telephone conference with John Valko; correspondence with attorney Forrest (twice); telephone conference with Elsie Teas; telephone conference with Ron Hitt; telephone conference with Forrest

Date: Tue Apr 13, 04

Time: 3.50

Activity: Telephone conference with Bill Humphrey; telephone conference with Jim Hecker; telephone conference with Will Forrest (twice); correspondence with Hecker; correspondence with Forrest; correspondence with class re continued coverage; correspondence with attorney Kienbaum and Sieve; review returned verification forms; telephone conference with Kienbaum and Forrest; review Cass' Request for Production of Documents

Date: Wed Apr 14, 04

Time: 5.25

Activity: Telephone conference with Kevin, from Local 180; telephone conference with Webb Hubbell and Brenda Mantz; telephone conference with Ryan Foley; telephone conference with attorney Forrest; correspondence with Forrest; telephone conference with Mr. Sandoval; correspondence with Ms. Hernandez; telephone conference with John Setty; correspondence with various Local Union Presidents (six); review returned verification forms; telephone conference with reporters

Date: Thu Apr 15, 04

Time: 5.25

Activity: Telephone conference with Raye Castle; telephone conference with Helen Heiland; correspondence with Helen Heiland; telephone conference with reporters; telephone conference with Laura Huston; telephone conference with Bill Humphrey (twice); review subpoena; telephone conference with Sherrick (twice); telephone conference with Mrs. Plunkett; telephone conference with Betty Miller; review Request for Production of Documents; review Subpoenas

Date: Fri Apr 16, 04

Time: 4.75

Activity: Telephone conference with Richard Gerardo; telephone conference with Kienbaum and Forrest; telephone conference with Web Hubbell; telephone conference with Ed Maynard; telephone conference with Mr. Saarveci; telephone conference with attorney Miller; review file re injunction bond; research re work product and Motion to Quash; telephone conference with Bill Humphrey

Date: Sat Apr 17, 04

Time: 2.00

Activity: Research work product

Date: Mon Apr 19, 04

Time: 5.00

Activity: Telephone conference with Bill Humphrey; telephone conference with James Lane; telephone conference with Web Hubbell; telephone conference with Will Forrest; telephone conference with James Bland; telephone conference with Jim Hecker; telephone conference with Mattie Bye; telephone conference with Raye Castel; telephone conference with Henry Malacara; telephone conference with Mr Saavedra; telephone conference with Jeff Miller; telephone conference with Jim Marshall; telephone conference with Albert Green; telephone conference with Mike Nicholson; telephone conference with Don Lebbon re Olga Kostenko; telephone conference with Flora Osgood; telephone conference with Kenneth Vanderposch; telephone conference with Mrs. Bosco; telephone conference with Maureen Eisenman; correspondence with attorney Forrest

Date: Tue Apr 20, 04

Time: 7.00

Activity: Telephone conference with Bill Humphrey; telephone conference with Helen Heiland; telephone conference with Mary Schoenhaar, Zurich's attorney; telephone conference with Ron Hitt; telephone conference with Janice Davis; telephone conference with Nicholson; telephone conference with attorney Miller; telephone conference with attorney Forrest; draft, review and revise Motion to Quash and Brief in Support; telephone conference with Ms. Boschee; telephone conference with Steven Ramig; telephone conference with Norman Zastrow; review documents re response to Second Request

Date: Wed Apr 21, 04

Time: 7.00

Activity: Telephone conference with Webb Hubbell; telephone conference with Mary Schoenhaar (twice); e-mail Hubbell; e-mail Schoenhaar; e-mail Nicholson; e-mail Leyshon; telephone conference with Nicholson; review documents; draft privilege log; correspondence with Zastrow; telephone conference with Mr. Ramig; telephone conference with attorney Lehshon; correspondence with Tony Wallace; review El Paso cost information

Date: Thu Apr 22, 04

Time: 9.50

Activity: Telephone conference with Bill Humphrey; telephone conference with attorney Hubbell; telephone conference with George Lisnich; telephone conference with Nicholson (twice); telephone conference with attorney Leyshon; review documents; draft Response to Case's Second Request for Production of Documents; review returned verification forms; e-mail Mark Naess; correspondence with Miller; e-mail Hubbell; Schoenhaar; Leyshon and Nicholson

Date: Fri Apr 23, 04

Time: 7.50

Activity: Correspondence with Darlene Britson; correspondence with Kevin Mielczkowski; telephone conference with Nicholson (twice); draft list of documents produced in response to Case's Second Request for Production of Documents; review returned verification forms and revise database; correspondence with attorney Forrest; telephone conference with Betty Britcher; correspondence with attorney Miller; telephone conference with Ms. Einerman; telephone conference with Jenny Sweaney

Date: Sun Apr 25, 04

Time: 4.75

Activity: Correspondence with attorney Forrest; review returned verification forms; review database; review settlement proposal; correspondence with Jenny Sweaney re settlement

Date: Mon Apr 26, 04

Time: 4.00

Activity: Telephone conference with John Valko; correspondence with attorney Forrest; correspondence with Mary Hacker; telephone conference with Saggau; correspondence with Ed Stuebe; telephone conference with Herbert Britson; telephone conference with Nicholson; correspondence with certain class members re injunction coverage; telephone conference with Ron Hitt; telephone conference with Kathleen Walker

Date: Tue Apr 27, 04

Time: 5.50

Activity: Telephone conference with Mr. Woger; correspondence with Mr. Woger; telephone conference with Helen Heiland; telephone conference with Jackie McCoy; telephone conference with Tom Seymour; telephone conference with Andy Nickelhoff; review Case's Response to El Paso's Supplemental Summary Judgment Brief; telephone conference with Connie West; telephone conference with attorney Forrest; review Case's Prehearing Brief; correspondence with attorney Sieve; telephone conference with David Wirt; telephone conference with Henry Bester; telephone conference with Gary Anderson; telephone conference with Olga re Mellanui Paros; telephone conference with Rosemary Mertens; telephone conference with Mr. Babcock; telephone conference with Fred Mock; review 4-15-04 without coverage list

Date: Wed Apr 28, 04

Time: 11.00

Activity: Telephone conference with Nicholson (twice); research and draft Brief re bond; correspondence with counsel; telephone conference with Roscoe Davenport

Date: Thu Apr 29, 04

Time: 7.50

Activity: Telephone conference with Mr. Martinez; telephone conference with Nicholson; correspondence with counsel; prepare for and attend hearing on bond

Date: Fri Apr 30, 04

Time: 0.50

Activity: Telephone conference with Bill Humphrey; telephone conference with Saggau

Date: Sat May 1, 04

Time: 3.50

Activity: Telephone conference with Andy Anderson; draft, review and revise Complaint

Date: Mon May 3, 04

Time: 1.00

Activity: Telephone conference with Bill Humphrey; correspondence with Will Forrest; telephone conference with Dennis Galloway; organize file

Date: Tue May 4, 04

Time: 1.00

Activity: Telephone conference with Jim Hecker; telephone conference with Jack Eyeman; telephone conference with Virginia Skrovronski; telephone conference with attorney Forrest

Date: Thu May 6, 04

Time: 4.00

Activity: Telephone conference with attorney Forrest (several times); telephone conference with Helen Heiland; telephone conference with Andy Anderson; telephone conference with attorney Miller; telephone conference with Burlington housing representative re Sofie Lago; review proposed order re bond; research re security bond issue

Date: Fri May 7, 04

Time: 5.50

Activity: Correspondence with attorney Thomas Magee; correspondence with attorney Forrest; telephone conference with Forrest; telephone conference with attorney Miller; telephone conference with Wilbur Montgomery; draft letter to class members; telephone conference with Beverly Golden; telephone conference with Bill Humphrey; telephone conference with Donald Ethier; telephone conference with Ms. Nyiri re Mrs. Hansen; telephone conference with Ruth Coats; telephone conference with Betty Meyer

Date: Sun May 9, 04

Time: 3.50

Activity: Prepare class mailing; correspondence with Forrest; review returned Verification Forms; draft proposed Order re bond increase

Date: Mon May 10, 04

Time: 1.50

Activity: Telephone conference with John Valko; telephone conference with Elsie Teas; telephone conference with Geraldine Johnson; correspondence with attorney Forrest; telephone conference with Gladys Daum; oversee mailing

Date: Tue May 11, 04

Time: 6.25

Activity: Telephone conference with Geraldine Johnson; telephone conference with Roscoe Davenport; telephone conference with Mr. Loehr; correspondence with Local Union Presidents (six); draft Notice of Withdrawal of Motion; correspondence with counsel; correspondence with clerk; telephone conference with Helen Heiland; telephone conference with attorney Forrest; draft, review and revise proposed Order; correspondence with attorney Miller; correspondence with clerk

Date: Wed May 12, 04

Time: 2.25

Activity: Telephone conference with attorney Miller; telephone conference with attorney Forrest; research and draft Response to Motion for Reconsideration

Date: Thu May 13, 04

Time: 8.00

Activity: Research, draft, review and revise Response to Motion for Reconsideration; correspondence with counsel; correspondence with clerk

Date: Fri May 14, 04

Time: 1.50

Activity: Correspondence with Sherry Horton; e-mail Case; telephone conference with Tom Strak; telephone conference with Connie West; telephone conference with Kathleen Walker

Date: Tue May 18, 04

Time: 0.75

Activity: Review Miller correspondence and proposed Order; review returned verification forms

Date: Wed May 19, 04

Time: 0.25

Activity: Telephone conference with attorney Forrest

Date: Fri May 21, 04

Time: 0.50

Activity: Telephone conference with John Kyriakis; telephone conference with Rondy Farmer

Date: Mon May 24, 04

Time: 4.00

Activity: Telephone conference with Kevin M. from Local 180; telephone conference with attorney Miller; correspondence with attorney Forrest (several); correspondence with Kevin M.; telephone conference with Ron Hitt; telephone conference with Mary Jaskulske (twice); telephone conference with Leonard Taylor; telephone conference with Maureen Eisenman

Date: Tue May 25, 04

Time: 4.75

Activity: Telephone conference with attorney Forrest; telephone conference with Mr. Urick; telephone conference with Mr. Tinsman; telephone conference with Mrs. Flahive; telephone conference with attorney Miller; telephone conference with Mrs. Martin; correspondence with Forrest; correspondence with Mr. Urick; e-mail with Chuck Shanks re Terre Haute retirees; correspondence with Mr. Martin; review correspondence and coverage lists from El Paso; telephone conference with Mary McVey

Date: Wed May 26, 04

Time: 1.25

Activity: Telephone conference with attorney Forrest; correspondence with Forrest; telephone conference with Holly at Walgreens re Mrs. McVey; telephone conference with Sharon Kiley re Mrs. Fritch; telephone conference with Jerry Mayhew re Mrs. Meyhew

Date: Thu May 27, 04

Time: 0.50

Activity: Telephone conference with Juanita McRoberts; telephone conference with Helen Mason

Date: Fri May 28, 04

Time: 0.50

Activity: Telephone conference with Setty; telephone conference with Maureen Eisenman

Date: Tue Jun 1, 04

Time: 2.25

Activity: Telephone conference with Mrs. Bester; review file and database; telephone conference with Sherry Harmon; telephone conference with Jack Bedwell; telephone conference with Mr. Raguse; telephone conference with Gary Halsted

Date: Wed Jun 2, 04

Time: 0.50

Activity: Correspondence with attorney Forrest re outstanding coverage issues

Date: Wed Jun 9, 04

Time: 4.00

Activity: Review Judge Duggan's Opinions denying Motion for Stay and Motion for Reconsideration; review e-mails re bond order; review bond order; telephone conference with Elsie Teas; correspondence with Saggau; correspondence with class plaintiffs (six); correspondence with Brian Sieve; telephone conference with attorney Miller

Date: Fri Jun 11, 04

Time: 5.75

Activity: Telephone conference with John Valko; telephone conference with Bill Humphrey; correspondence with Local Presidents (six); telephone conference with Helen Hieland; review and revise proposed Order re bond increase; correspondence with attorney Miller re proposed Orders; draft Reply re Class Certification Order; review list of refund amounts to be diverted to bond

Date: Mon Jun 14, 04

Time: 2.00

Activity: Prepare for settlement negotiations

Date: Tue Jun 15, 04

Time: 14.50

Activity: Attend settlement negotiations in Chicago

Date: Wed Jun 16, 04

Time: 7.50

Activity: Telephone conference with Maureen Eisenman; correspondence with Jim Hecker; correspondence with attorney Forrest (two); telephone conference with Leonard Taylor; correspondence with Saggau; telephone conference with Saggau; telephone conference with Arlene Bodi; telephone conference with Silvia Presta; telephone conference with Karen Appelzeller; telephone conference with Helen Heiland; telephone conference with Rondy Farmer; review e-mail from attorney Miller; review refunds held as bond list; review and revise database

Date: Thu Jun 17, 04

Time: 4.25

Activity: Review "Refund Held as Bond" list; update data base; review proposed order re bond; correspondence with attorney Miller; review Case's Supplemental Brief re Motion for Summary Judgment on Cross Claim; correspondence with attorney Ankers

Date: Fri Jun 18, 04

Time: 1.00

Activity: Telephone conference with Will Forrest; review letter from attorney Miller re bond order; review correspondence to attorney Kienbaum

Date: Mon Jun 21, 04

Time: 4.50

Activity: Telephone conference with Saggau; correspondence with Rondy Farmer; telephone conference with Alice Locke; correspondence with Alice Locke; conference call with Mediator Tobias and attorneys Sieve, Kienbaum and McKnight; draft settlement term sheet; telephone conference with Mr. Flores

Date: Tue Jun 22, 04

Time: 3.00

Activity: Telephone conference with Hewitt attorney Lisa Muir; telephone conference with attorney Saggau; review and revise settlement term sheet; correspondence with class plaintiffs; telephone conference with Indiana Medicaid office re Roberta Thompson

Date: Wed Jun 23, 04

Time: 1.25

Activity: Telephone conference with Saggau (twice); correspondence with Saggau; revise term sheet; telephone conference with Elsie Teas; telephone conference with Nancy Nelson; telephone conference with Bill Humphrey

Date: Thu Jun 24, 04

Time: 5.50

Activity: Telephone conference with Ron Hitt; telephone conference with Ed Maynard; telephone conference with Wilbur Montgomery; prepare for and attend conference with Rich Atwood, Richard Ruppert, Saggau and McKnight; revise settlement proposal; e-mail Saggau, Atwood and Ruppert; review correspondence from attorney Forrest; review correspondence from Local 180 re coverage problems

Date: Fri Jun 25, 04

Time: 1.75

Activity: Review and calendar Sixth Circuit briefing schedule; correspondence with Saggau; telephone conference with Saggau; correspondence with Jim Hecker; review database re document production; review correspondence from Local 180 and El Paso re deceased retirees

Date: Mon Jun 28, 04

Time: 1.25

Activity: Telephone conference with Gary Halsted; telephone conference with Frances Doan; telephone conference with Saggau; revise settlement proposal; correspondence with attorneys Kienbaum and Sieve; telephone conference with Frances Doan

Date: Tue Jun 29, 04

Time: 0.25

Activity: Correspondence with attorney Miller

Date: Thu Jul 1, 04

Time: 0.75

Activity: Correspondence with Rondy Farmer; review Motion for Entry of Order; review correspondence from Local 180

Date: Fri Jul 2, 04

Time: 4.50

Activity: Draft, review and revise Response to Motion for Entry of Bond order; correspondence with clerk

Date: Mon Jul 5, 04

Time: 1.25

Activity: Organize file; review class lists, enrollments, death index

Date: Tue Jul 6, 04

Time: 1.75

Activity: Correspondence with Sherry Horton, Local 180 (twice); review and update database; telephone conference with Aldo Presta's daughter; telephone conference with John Valko

Date: Wed Jul 7, 04

Time: 1.75

Activity: Correspondence with class plaintiffs; telephone conference with Tom Kienbaum; telephone conference with Marian Petersen; telephone conference with Dawn Neuses

Date: Thu Jul 8, 04

Time: 6.00

Activity: Telephone conference with Bill Humphrey; prepare for and attend hearing on class certification and Case's Motion for Summary Judgment on Cross Claim

Date: Fri Jul 9, 04

Time: 1.00

Activity: Telephone conference with attorney Forrest; review CNH Global annual report; review proposed Stipulation to Modify Caption

Date: Mon Jul 12, 04

Time: 1.00

Activity: Telephone conference with Elsie Teas; telephone conference with Saggau; telephone conference with Martha Call; conference with Sam McKnight

Date: Tue Jul 13, 04

Time: 1.00

Activity: Telephone conference with attorney Forrest; draft Sixth Circuit Court Appearances (two); correspondence with Sixth Circuit Court of Appeals (two)

Date: Fri Jul 16, 04

Time: 1.25

Activity: Telephone conference with attorney Forrest; review CNH Annual Report re merger; correspondence with attorney Miller; telephone conference with Karen Appenzeller

Date: Mon Jul 19, 04

Time: 0.50

Activity: Telephone conference with reporter re status; telephone conference with Jim Hecker

Date: Wed Jul 21, 04

Time: 6.25

Activity: Prepare for and attend settlement discussions with El Paso; telephone conference with Saggau

Date: Thu Jul 22, 04

Time: 0.75

Activity: Correspondence with Kevin Mieczkowski re Willie Curtis; review letter from Sherry Horton; search death index

Date: Fri Jul 23, 04

Time: 0.50

Activity: Correspondence with attorney Forrest; correspondence with Saggau

Date: Mon Jul 26, 04

Time: 1.25

Activity: Telephone conference with Ron Hitt; review information re mandatory generic plans; correspondence with class plaintiffs

Date: Tue Jul 27, 04

Time: 0.25

Activity: Telephone conference with Helen Heiland

Date: Wed Jul 28, 04

Time: 0.50

Activity: Correspondence with Floyd Coleman; update privilege log

Date: Thu Jul 29, 04

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Mon Aug 2, 04

Time: 0.50

Activity: Review Case's Appeal Brief

Date: Tue Aug 3, 04

Time: 1.50

Activity: Telephone conference with Kienbaum and Forrest; review El Paso's Brief; research re Case's Appeal Brief; correspondence with Saggau

Date: Wed Aug 4, 04

Time: 1.25

Activity: Telephone conference with Bill Humphrey; telephone conference with Saggau; telephone conference with Dennis Nerada; review database re deceased retirees

Date: Thu Aug 5, 04

Time: 2.00

Activity: Review attorney Miller's correspondence re merger and accompanying documents; research successorship law

Date: Fri Aug 6, 04

Time: 5.75

Activity: Telephone conference with John Valko; review class data base with El Paso coverage lists; draft Appeal Brief

Date: Mon Aug 9, 04

Time: 7.50

Activity: Review attorney Forrest's correspondence re plan coverage; review and revise database; telephone conference with Larry Grigsby; research, draft and revise Appeal Brief

Date: Tue Aug 10, 04

Time: 7.00

Activity: Telephone conference with Bill Humphrey; telephone conference with Ms. DeWitt; research and draft Appeal Brief

Date: Wed Aug 11, 04

Time: 10.00

Activity: Telephone conference with John Setty; research and draft Appeal Brief

Date: Thu Aug 12, 04

Time: 3.00

Activity: Research, draft, review and revise Appeal Brief

Date: Fri Aug 13, 04

Time: 1.50

Activity: Draft, review and revise Appeal Brief

Date: Mon Aug 16, 04

Time: 9.25

Activity: Telephone conference with Allison, Channel 4 News; telephone conference with Bill Hightower; research and draft Appeal Brief

Date: Tue Aug 17, 04

Time: 7.00

Activity: Telephone conference with attorney Edelschick; research, draft and review Appeal Brief

Date: Wed Aug 18, 04

Time: 4.00

Activity: Correspondence with Saggau; correspondence with attorney Forrest; correspondenc
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Date: Thu Aug 19, 04

Time: 4.75

Activity: Correspondence with Silvana Presta; telephone conference with Tom Seymour;
draft and revise Appeal Brief

Date: Fri Aug 20, 04

Time: 6.50

Activity: Research; draft, review and revise Appeal Brief

Date: Mon Aug 23, 04

Time: 5.00

Activity: Telephone conference with Elsie Teas; research and draft Appeal Brief

Date: Tue Aug 24, 04

Time: 1.75

Activity: E-mail to Saggau; research and draft Brief; telephone conference with Ruth Coates;
telephone conference with Turecek

Date: Wed Aug 25, 04

Time: 4.75

Activity: Draft, review and revise Appeal Brief

Date: Thu Aug 26, 04

Time: 3.50

Activity: Draft, review and revise Appeal Brief

Date: Fri Aug 27, 04

Time: 0.50

Activity: Draft Appeal Brief

Date: Mon Aug 30, 04

Time: 0.75

Activity: Telephone conference with Ron Hitt; telephone conference with Leroy Zemke;
telephone conference with Gwen Patillo

Date: Tue Aug 31, 04

Time: 0.25

Activity: Telephone conference with attorney Forrest

Date: Wed Sep 1, 04

Time: 8.75

Activity: Draft, review and revise Appeal Brief; review death notices; revise database

Date: Thu Sep 2, 04

Time: 8.00

Activity: Telephone conference with Dale Davis; draft, review and revise Appeal Brief

Date: Fri Sep 3, 04

Time: 9.00

Activity: Draft, review and revise Appeal Brief (Case); research re appeal brief (El Paso)

Date: Tue Sep 7, 04

Time: 19.00

Activity: Telephone conference with John Valko; telephone conference with Rosemarie Mertens; review El Paso's Brief; draft El Paso Appeal Brief; review Judge Duggan's Decisions on Case's Cross Claim and Class Certification

Date: Wed Sep 8, 04

Time: 5.25

Activity: Telephone conference with Bill Humphrey; research and draft El Paso Brief

Date: Thu Sep 9, 04

Time: 6.00

Activity: Draft, review and revise Appeal Brief (El Paso); correspondence with class members; correspondence with Saggau

Date: Fri Sep 10, 04

Time: 9.00

Activity: Telephone conference with Richard Girardo; draft, review and revise Appeal Brief (El Paso)

Date: Mon Sep 13, 04

Time: 9.50

Activity: Telephone conference with Elsie Teas; draft, review and revise Appeal Brief (El Paso)

Date: Tue Sep 14, 04

Time: 9.50

Activity: Telephone conference with John Valko; correspondence with Judge Duggan; telephone conference with attorney Forrest; telephone conference with Bill Humphrey; telephone conference with attorney Kienbaum; draft, review and revise Case Appeal Brief; draft, review and revise El Paso Appeal Brief

Date: Wed Sep 15, 04

Time: 13.50

Activity: Draft, review and revise Appeal Brief (Case and El Paso); telephone conference with Bill Humphrey

Date: Thu Sep 16, 04

Time: 12.00

Activity: Attend facilitation in Cincinnati

Date: Fri Sep 17, 04

Time: 1.25

Activity: Telephone conference with Gerald Johnson; correspondence with Saggau; correspondence with class representatives re Appeal Brief

Date: Mon Sep 20, 04

Time: 1.25

Activity: Organize file; correspondence with attorney Forrest

Date: Tue Sep 21, 04

Time: 1.75

Activity: Telephone conference with Ron Hitt; review El Paso's Motion for Reconsideration; telephone conference with Tom Kienbaum

Date: Wed Sep 22, 04

Time: 1.00

Activity: Review Case's Motion for Clarification; conference with Sam re response to El Paso's Motion for Reconsideration

Date: Thu Sep 23, 04

Time: 2.75

Activity: Telephone conference with Henry Bester; correspondence with attorney Forrest; review enrollment lists re coverage

Date: Mon Sep 27, 04

Time: 3.50

Activity: Correspondence with attorney Forrest; search internet re CNH Global; review coverage lists and Social Security Death Index; review Supplemental Brief

Date: Tue Sep 28, 04

Time: 5.25

Activity: Telephone conference with Saggau; telephone conference with attorney Forrest; correspondence with attorney Forrest; review El Paso coverage lists; review Supplemental Brief to indemnification issue

Date: Wed Sep 29, 04

Time: 0.50

Activity: Telephone conference with John Valko; correspondence with Valko

Date: Thu Sep 30, 04

Time: 0.25

Activity: Review attorney Forrest's e-mail re Joint Appendix

Date: Fri Oct 1, 04

Time: 0.25

Activity: Telephone conference with Ann Johnson

Date: Mon Oct 4, 04

Time: 1.00

Activity: Telephone conference with Andy Anderson; review and revise database re recent deaths; search internet re deaths

Date: Tue Oct 5, 04

Time: 4.25

Activity: Telephone conference with Mr. Girardo; telephone conference with Bill Humphrey; telephone conference with attorney Forrest (several times); review documents and Briefs re Joint Appendix; correspondence with Forrest; review information re deceased class members; revise data base

Date: Wed Oct 6, 04

Time: 0.50

Activity: Telephone conference with Charles Tobias, facilitator; telephone conference with attorney Forrest re Joint Appendix

Date: Thu Oct 7, 04

Time: 0.50

Activity: Telephone conference with attorney Forrest; review Haas deposition re Joint Appendix

Date: Fri Oct 8, 04

Time: 0.75

Activity: Telephone conference with attorney Forrest (twice); review appendix designation

Date: Mon Oct 11, 04

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Wed Oct 13, 04

Time: 0.50

Activity: Telephone conference with John Setty; telephone conference with Deborah Brockway

Date: Thu Oct 14, 04

Time: 1.50

Activity: Review and revise database; telephone conference with Frank Bisceglia; telephone conference with George Lisnich; telephone conference with Laurissa Mertins; telephone conference with Marilyn Pruitt

Date: Mon Oct 18, 04

Time: 4.00

Activity: Review Joint Appendix; prepare final Case Appeal Brief

Date: Tue Oct 19, 04

Time: 6.75

Activity: Telephone conference with Ron Hitt; prepare final Case Appeal Brief; prepare final El Paso Appeal Brief

Date: Wed Oct 20, 04

Time: 5.25

Activity: Telephone conference with George Lisnich; telephone conference with attorney Forrest; review El Paso's pleadings re Motion for Reconsideration; prepare final El Paso Appeal Brief; telephone conference with Don Sanford re Carmela Sanford

Date: Thu Oct 21, 04

Time: 2.00

Activity: Telephone conference with George Santovi; telephone conference with attorney Kienbaum; review post 10-3-93 retiree database

Date: Fri Oct 22, 04

Time: 0.75

Activity: Telephone conference with Sherrick and Saggau; organize file

Date: Mon Oct 25, 04

Time: 5.25

Activity: Telephone conference with Ron Hitt; e-mail Sherrick and Saggau re VEBA; e-mail Case's attorney; review and revise final Case Appeal Brief; review documents provided by class members; update privilege log

Date: Tue Oct 26, 04

Time: 6.25

Activity: Draft, review and revise final El Paso Appeal Brief; e-mail Case's attorney

Date: Wed Oct 27, 04

Time: 4.25

Activity: Finalize El Paso Brief; correspondence with Sixth Circuit Clerk; telephone conference with Connie Wadzinski

Date: Tue Nov 2, 04

Time: 0.75

Activity: Review changes in status; search Social Security Death Index; modify database

Date: Wed Nov 3, 04

Time: 0.25

Activity: Telephone conference with Catherine Goodland

Date: Thu Nov 4, 04

Time: 2.00

Activity: Organize file; correspondence with class representatives

Date: Wed Nov 10, 04

Time: 1.00

Activity: Review Judge Duggan's orders; telephone conference with Gary Mohler

Date: Fri Nov 12, 04

Time: 1.00

Activity: Correspondence with Sherry Horton; review and revise database; correspondence with attorney Forrest

Date: Mon Nov 15, 04

Time: 3.50

Activity: Telephone conference with Mr. Salas; telephone conference with Tom Seymour; telephone conference with Janice Davis; review document production; review files which have not been produced; organize file

Date: Tue Nov 16, 04

Time: 2.25

Activity: Correspondence with Sherry Horton, Local 180; review files, document production

Date: Wed Nov 17, 04

Time: 0.25

Activity: Review El Paso's appeal of indemnity decisions

Date: Thu Nov 18, 04

Time: 0.25

Activity: Telephone conference with Loren Bauer

Date: Mon Nov 22, 04

Time: 5.25

Activity: Telephone conference with Ron Hitt; review documents, revise database

Date: Tue Nov 23, 04

Time: 5.00

Activity: Review Meridian decision; review files and file production

Date: Wed Nov 24, 04

Time: 2.75

Activity: Review personnel files re document production

Date: Mon Nov 29, 04

Time: 4.00

Activity: Telephone conference with Sherrick; e-mail Sherrick; review produced benefit files; telephone conference with Herb Trix

Date: Tue Nov 30, 04

Time: 2.50

Activity: Review document production and benefit files; conference with Saggau

Date: Wed Dec 1, 04

Time: 0.25

Activity: Telephone conference with John Setty

Date: Thu Dec 2, 04

Time: 1.75

Activity: Review document production; revise database

Date: Mon Dec 6, 04

File ID: 8910/

Time: 0.25

Activity: Telephone conference with Charles Griffin

Date: Wed Dec 8, 04

Time: 1.00

Activity: Review document production information

Date: Thu Dec 9, 04

Time: 3.50

Activity: Telephone conference with Sherrick; revise database re deceased retirees; review file production; telephone conference with Richard Johnson; email attorney Ankers

Date: Fri Dec 10, 04

Time: 1.25

Activity: Review correspondence from Sixth Circuit; telephone conference with attorney Forrest; review documents from Tom Seymour; review document production

Date: Mon Dec 13, 04

Time: 7.00

Activity: Review Case's Motion to Dismiss El Paso's Appeal; telephone conference with Tom Seymour; review files re production of individual files

Date: Tue Dec 14, 04

Time: 5.50

Activity: Review produced documents; review document production

Date: Wed Dec 15, 04

Time: 2.50

Activity: Telephone conference with Leona Iverson; review produced documents; telephone conference with Elsie Teas; review motion to consolidate and expedite appeal

Date: Mon Dec 20, 04

Time: 6.75

Activity: Telephone conference with Bill Humphrey; telephone conference with Charles Tobias; review file production; modify database re file production

Date: Tue Dec 21, 04

Time: 8.00

Activity: Review files re production of documents

Date: Wed Dec 22, 04

Time: 5.00

Activity: Review files and database re document production; correspondence with attorney Edelschick; telephone conference with Larry Grigsby

Date: Mon Dec 27, 04

Time: 1.50

Activity: Review Case's Response to El Paso's Motion to Consolidate; telephone conference with attorney Forrest; review document production and database; telephone conference with attorney Ankers

Date: Tue Dec 28, 04

Time: 2.00

Activity: Review document production re critical documents

Date: Wed Dec 29, 04

Time: 1.50

Activity: Review El Paso's Opposition to Case's Motion to Dismiss Appeal; review documents produced by Case

Date: Thu Dec 30, 04

Time: 0.25

Activity: Review attorney Forrest letter to attorney Edelschick; review e-mail from Edelschick to Forrest

Date: Mon Jan 3, 05

Time: 0.75

Activity: Review document production

Date: Tue Jan 4, 05

Time: 0.50

Activity: Review information re deceased class members and enter into database

Date: Wed Jan 5, 05

Time: 0.25

Activity: Telephone conference with Kenneth Jaros re Emma Jaros

Date: Thu Jan 6, 05

Time: 4.00

Activity: Review documents produced by Case

Date: Fri Jan 7, 05

Time: 3.00

Activity: Review East Moline documents

Date: Mon Jan 10, 05

Time: 5.25

Activity: Telephone conference with Elsie Teas; telephone conference with Tom Seymour;
telephone conference with Rick Gerardo; review documents produced by Case

Date: Tue Jan 11, 05

Time: 5.00

Activity: Research re class certification issues

Date: Thu Jan 13, 05

Time: 2.25

Activity: Telephone conference with attorney Edelschick; research CNH Global web sites
and corporate filings; telephone conference with Niraj Ganatra; telephone conference
with Ellen Schultz

Date: Tue Jan 18, 05

Time: 1.00

Activity: Telephone conference with Bill Humphrey; review Motion to Amend Caption;
research merger law

Date: Wed Jan 19, 05

Time: 4.75

Activity: Telephone conference with Wilbur Montgomery; research re response to motion
to alter caption

Date: Fri Jan 21, 05

Time: 0.25

Activity: Telephone conference with John Setty

Date: Mon Jan 24, 05

Time: 0.50

Activity: Telephone conference with John Setty; review fax from Setty; telephone conference with Mark (retiree)

Date: Tue Jan 25, 05

Billing rate type: UAW

Time: 3.50

Activity: Research internet re corporate records; review file re Response to Motion to Change Caption

Date: Wed Jan 26, 05

Time: 8.50

Activity: Correspondence with Jim Reynolds; telephone conference with Jim Hecker; review documents; telephone conference with Mark, Local 180; telephone conference with Racine County Register of Deeds; draft, review and revise Response to Motion to Change Caption

Date: Thu Jan 27, 05

Time: 7.00

Activity: Research and draft Response to Motion to Alter Caption

Date: Fri Jan 28, 05

Time: 1.50

Activity: Draft, review and revise Response to Motion to Change Caption; telephone conference with Andy Anderson; telephone conference with Tom Seymour

Date: Sat Jan 29, 05

Time: 5.50

Activity: Draft, review and revise Response to Motion to Alter Caption

Date: Sun Jan 30, 05

Time: 3.25

Activity: Research and draft Response to Motion to Amend Caption

Date: Mon Jan 31, 05

Time: 6.50

Activity: Telephone conference with John Grigsby, Trustee; telephone conference with Sherrick; draft, review and revise Response to Motion to Correct Caption; review and organize Exhibits; telephone conference with Ken Jaros re Emma Jaros

Date: Tue Feb 1, 05

Time: 3.00

Activity: Finalize Response to Motion to Correct Caption; telephone conference with Saggau; telephone conference with Sherrick; review VEBA Plan; telephone conference with John Grigsby, VEBA Trustee; correspondence with counsel re response

Date: Wed Feb 2, 05

Time: 2.25

Activity: Telephone conference with Bill Humphrey; organize file; prepare benefit representative correspondence binders

Date: Sat Feb 5, 05

Time: 1.00

Activity: Review status changes; revise database; organize file

Date: Mon Feb 7, 05

Time: 2.25

Activity: Telephone conference with Jim Hecker; e-mail Saggau; review VEBA Plan; draft amendment to VEBA plan re post 10/3/93 retirees; email Sherrick

Date: Wed Feb 9, 05

Time: 0.75

Activity: Revise proposed plan amendment

Date: Wed Feb 16, 05

Time: 0.25

Activity: Correspondence with McLaughlin Company re bond

Date: Mon Feb 21, 05

Time: 0.50

Activity: Telephone conference with Mrs. Wallers; telephone conference with John Setty

Date: Tue Feb 22, 05

Time: 0.25

Activity: Telephone conference with Warren Watkins

Date: Thu Feb 24, 05

Time: 0.25

Activity: Telephone conference with Janet Davis

Date: Fri Feb 25, 05

Time: 0.75

Activity: E-mail with Sherrick re VEBA; telephone conference with attorney Forrest; review Motion to Extend Briefing Dates on indemnification claim

Date: Mon Feb 28, 05

Time: 1.00

Activity: Telephone conference with Ron Hitt; telephone conference with Mr. York; organize file

Date: Tue Mar 1, 05

Time: 0.50

Activity: Telephone conference with Helen Heiland; telephone conference with Bill Humphries

Date: Fri Mar 4, 05

Time: 0.75

Activity: Telephone conference with Mike Saggau (2); revise plan amendment; e-mail Saggau

Date: Mon Mar 7, 05

Time: 0.75

Activity: Telephone conference with Elsie Teas; draft letters re meetings

Date: Tue Mar 8, 05

Time: 0.25

Activity: Telephone conference with Wilma Gentry's son

Date: Wed Mar 9, 05

Time: 2.00

Activity: Draft letters to retirees re meetings; prepare address labels; review database; organize files; instruct paralegal re critical documents

Date: Thu Mar 10, 05

Time: 4.00

Activity: Telephone conference with John Setty (twice); draft letters to retirees; telephone conference with Billy Cox (twice); set up meeting in Southaven; oversee mailings to retirees

Date: Fri Mar 11, 05

Time: 0.25

Activity: Telephone conference with retiree Giradoux

Date: Tue Mar 22, 05

Time: 4.00

Activity: Meeting with retirees in Southaven, Mississippi

Date: Fri Mar 25, 05

Time: 4.00

Activity: Meeting with retirees in Terre Haute, Indiana

Date: Mon Mar 28, 05

Time: 2.25

Activity: Correspondence with John Setty; review Saggau e-mail; review proposed VEBA Plan amendment; review Santovi letter; review deceased retiree information; review coverage lists; organize file

Date: Tue Mar 29, 05

Time: 1.00

Activity: Telephone conferences with Lucy Peterson, Mary Stone, Flora Osgood, Murlene Bullard, and Donald Plambeck

Date: Wed Mar 30, 05

Time: 0.25

Activity: Telephone conference with John Setty

Date: Thu Mar 31, 05

Time: 3.75

Activity: Telephone conference with Geraldine Johnson; telephone conference with Skip Pauley; review 1993 Shutdown Agreement; review documents produced by Terre Haute retirees

Date: Fri Apr 1, 05

Time: 3.00

Activity: Telephone conference with Ron Hitt; review and organize documents; telephone conference with Recording Secretary, Local 180; research re motion to add class members to injunction

Date: Mon Apr 4, 05

Time: 1.75

Activity: Telephone conference with Joel Smith re Stephen Williams; correspondence with Tony Williams; review documents re 1993 Closing Agreement

Date: Thu Apr 7, 05

Time: 4.00

Activity: Conference with Andy Anderson; meet with retirees

Date: Fri Apr 8, 05

Time: 1.25

Activity: Review e-mail from Ralph Gaeto; telephone conference with Tom Seymour; review class list re deceased class members

Date: Mon Apr 11, 05

Time: 6.00

Activity: Prepare for retiree meeting; confer with McKnight re meetings; travel to Moline

Date: Tue Apr 12, 05

Time: 4.00

Activity: Prepare for and attend retiree meeting; confer with Bill Humphrey

Date: Thu Apr 14, 05

Time: 1.25

Activity: Telephone conference with Andy Anderson; review claim forms; organize file;
telephone conference with Ron Field, Hawk Eye

Date: Fri Apr 15, 05

Time: 0.50

Activity: Telephone conference with Saggau; review subpoenas to UAW Locals

Date: Mon Apr 18, 05

Time: 5.50

Activity: Research and prepare for oral argument; review documents received from retirees;
draft supplement exhibit pleading; review attorney correspondence

Date: Tue Apr 19, 05

Time: 2.50

Activity: Prepare for oral argument re Motion to Amend Caption

Date: Wed Apr 20, 05

Time: 10.00

Activity: Review and revise database; prepare for and attend hearing on Motion to Amend
Caption; research re CNH Global merger issue

Date: Mon Apr 25, 05

Time: 0.75

Activity: Telephone conference with Ron Hitt; telephone conference with Fred Mock; review
Duggan's opinion re case caption

Date: Tue Apr 26, 05

Time: 0.25

Activity: Telephone conference with John Setty

Date: Thu Apr 28, 05

Time: 0.25

Activity: Telephone conference with Helen Mason

Date: Mon May 2, 05

Time: 3.50

Activity: Organize file; review documents; review critical documents; draft correspondence
to attorney Forrest re post 10/3/93 retirees

Date: Tue May 3, 05

Time: 1.00

Activity: Review May billing lists from attorney Forrest; review Hamilton correspondence

Date: Thu May 5, 05

Time: 0.25

Activity: Telephone conference with John Valko

Date: Fri May 6, 05

Time: 0.50

Activity: Draft and revise letter to attorney Forrest re post 10/3/1993 retirees

Date: Mon May 9, 05

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Mon May 16, 05

Time: 0.50

Activity: Correspondence with Santovi; review documents

Date: Tue May 17, 05

Time: 0.50

Activity: Telephone conference with Mary McElvain (twice); locate Pactiv's phone number

Date: Fri May 20, 05

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon May 23, 05

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Fri May 27, 05

Time: 1.00

Activity: Correspondence with the Kannenbergs; review correspondence; draft privilege log

Date: Wed Jun 1, 05

Time: 2.00

Activity: Draft memo re document production and database entry; review document database

Date: Fri Jun 3, 05

Time: 0.75

Activity: Telephone conference with Saggau; telephone conference with John Setty; correspondence with Fred Mock

Date: Wed Jun 15, 05

Time: 0.75

Activity: Review correspondence from Sherry Horton re retiree deaths; prepare class list

databases; e-mail Ms. Horton

Date: Thu Jun 23, 05

Time: 0.25

Activity: Telephone conference with Ron Dalahan

Date: Fri Jun 24, 05

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Wed Jun 29, 05

Time: 3.50

Activity: Review VEBA Plan re contributions for post 10/3/93 retirees; correspondence with Saggau; review plans re precertification review; review Hardesty appeal; correspondence with Forrest re precertification review issue

Date: Thu Jun 30, 05

Time: 0.50

Activity: Organize documents

Date: Fri Jul 1, 05

Time: 0.50

Activity: Telephone conference with Saggau; review Case letter re VEBA

Date: Sun Jul 3, 05

Time: 1.50

Activity: Review El Paso Health Care Plan census; review social security death index; draft memo to Sandy and Brad re review and comparison of most recent plan census with our database; image documents for production

Date: Tue Jul 5, 05

Time: 1.25

Activity: Telephone conference with John Valko; conference with SCM re VEBA fund; telephone conference with attorney Forrest

Date: Wed Jul 6, 05

Time: 1.75

Activity: Telephone conference with James Marshall; correspondence with John Setty; e-mail John Valko and Tony Wallace; review S. Horton letter and input death information

Date: Mon Jul 11, 05

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Wed Jul 13, 05

Time: 0.50

Activity: Review letter from Local 180 re retiree deaths; review e-mail from Tom Seymour re retiree death; revise database

Date: Fri Jul 15, 05

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Mon Jul 18, 05

Time: 0.50

Activity: Review Saggau e-mail; review documents re Medicare Part B benefit; E-mail Saggau

Date: Tue Jul 19, 05

Time: 2.50

Activity: Telephone conference with Murlene Bullard; review documents re Raymond Bullard; correspondence with attorney Forrest; review documents re post 10/93 retirees

Date: Thu Jul 21, 05

Time: 0.25

Activity: Telephone conference with Bill Humphrey

Date: Wed Jul 27, 05

Time: 1.00

Activity: Review El Paso's Motion to Modify Preliminary Injunction

Date: Thu Jul 28, 05

Time: 0.25

Activity: Telephone conference with Ronald Hitt

Date: Fri Jul 29, 05

Time: 2.00

Activity: Telephone conference with Ray Rogers; review census of plan participants; search death index; review documents re lifetime documents

Date: Mon Aug 1, 05

Time: 0.25

Activity: Telephone conference with Bill Humphrey

Date: Tue Aug 2, 05

Time: 0.25

Activity: Telephone conference with attorney Forrest

Date: Wed Aug 3, 05

Time: 0.50

Activity: Telephone conference with Ann Johnson; review correspondence from Local 180 re retiree census changes

Date: Sun Aug 7, 05

Time: 0.25

Activity: Review Saggau e-mail; e-mail Saggau

Date: Mon Aug 8, 05

Time: 0.50

Activity: Telephone conference with Saggau; telephone conference with Elsie Teas

Date: Tue Aug 9, 05

Time: 4.00

Activity: Telephone conference with Tom Seymour; research re jurisdiction of district court to modify injunction; enter and review documents; revise database re deaths

Date: Wed Aug 10, 05

Time: 3.75

Activity: Review documents; telephone conference with Mrs. Sadler; organize file

Date: Fri Aug 12, 05

Time: 0.75

Activity: Review file; prepare for Motion to Dismiss

Date: Wed Aug 17, 05

Time: 0.75

Activity: Telephone conference with Janet Davis; review and scan documents

Date: Mon Aug 22, 05

Time: 0.25

Activity: Telephone conference with Ray Rogers re problems with United Health Care

Date: Tue Aug 23, 05

Time: 0.50

Activity: Telephone conference with John Setty; telephone conference with Tammy Surwic re Beulah Keenum

Date: Wed Aug 24, 05

Time: 1.00

Activity: Telephone conference with Janice Nichols; telephone conference with Saggau; review document scanning process

Date: Thu Aug 25, 05

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Fri Aug 26, 05

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon Aug 29, 05

Time: 1.50

Activity: Telephone conference with Tom Seymour; telephone conference with Clifford Spencer; telephone conference with Saggau; review United Healthcare EOB's

Date: Tue Aug 30, 05

Time: 0.25

Activity: Telephone conference with Bill Humphrey

Date: Wed Aug 31, 05

Time: 0.25

Activity: Telephone conference with Saggau

Date: Thu Sep 1, 05

Time: 2.25

Activity: Telephone conference with John Setty; research re Response to Motion to Amend Preliminary Injunction

Date: Fri Sep 2, 05

Time: 1.50

Activity: Telephone conference with John Setty; telephone conference with Ron Dollahan; draft Response to Motion to Modify Preliminary Injunction; organize file

Date: Tue Sep 6, 05

Time: 3.00

Activity: Research and draft Response to Motion to Modify Injunction

Date: Thu Sep 8, 05

Time: 0.50

Activity: Review 1990 Insurance Plan

Date: Fri Sep 9, 05

Time: 2.50

Activity: Review explanation of benefits; correspondence with Forrest

Date: Tue Sep 13, 05

Time: 5.00

Activity: Review United Health Care documents; review medical records re rejected claims; review Insurance Plan; telephone conference with Marshville Clinic; correspondence with attorney Forrest

Date: Wed Sep 14, 05

Time: 0.25

Activity: Telephone conference with Bill Humphrey

Date: Thu Sep 15, 05

Time: 7.00

Activity: Draft, review and revise Response to Motion to Modify Injunction

Date: Fri Sep 16, 05

Time: 4.25

Activity: Research, draft, review and revise Response

Date: Mon Sep 19, 05

Time: 2.00

Activity: Draft, review and revise Brief in Response to Motion to Modify Injunction

Date: Tue Sep 20, 05

Time: 0.50

Activity: Telephone conference with Saggau; telephone conference with McKnight re Response Brief

Date: Thu Sep 22, 05

Time: 0.50

Activity: Review Saggau declaration; telephone conference with Mike Saggau

Date: Mon Sep 26, 05

Time: 0.25

Activity: Telephone conference with John Setty

Date: Wed Sep 28, 05

Time: 2.50

Activity: Telephone conference with Saggau; email to John Grigsby re VEBA and post 10/3/93 retirees; review database re retirees excluded from injunction

Date: Fri Sep 30, 05

Time: 2.25

Activity: Research; correspondence with Forrest (two); letter to post-10/3/93 retirees; telephone conference with Winchester; telephone conference with Mr. Krzanowski; review documents

Date: Mon Oct 3, 05

Time: 0.25

Activity: Telephone conference with Will Forrest

Date: Tue Oct 4, 05

Time: 1.25

Activity: Review Forrest letter re claims issues; review and update database

Date: Wed Oct 5, 05

Time: 1.50

Activity: Telephone conference with S. Sadler re Ms. Schwert; review documents from benefit files

Date: Thu Oct 6, 05

Time: 1.00

Activity: Review benefit files; review claims administration problems

Date: Fri Oct 7, 05

Time: 1.50

Activity: Telephone conference with Bill Humphrey; telephone conference with Sixth Circuit Clerk; correspondence with Forrest re unpaid claims

Date: Mon Oct 10, 05

Time: 1.50

Activity: Telephone conference with Elsie Teas; correspondence with Forrest; telephone conference with John Setty; review claims appeal denial; review El Paso coverage lists

Date: Tue Oct 11, 05

Time: 4.25

Activity: Telephone conference with Ankers; review benefit file documents; search Social Security Death Index; correspondence with Forrest re class coverage lists

Date: Fri Oct 14, 05

Time: 1.25

Activity: Review correspondence with deceased class members; revised data base; correspondence with Forrest (2)

Date: Mon Oct 17, 05

Time: 0.25

Activity: Telephone conference with Will Forrest

Date: Fri Oct 21, 05

Time: 1.00

Activity: Telephone conference with Will Forrest; review Class Member documents

Date: Mon Oct 24, 05

Time: 0.25

Activity: Telephone conference with John Setty

Date: Wed Oct 26, 05

Time: 0.75

Activity: Telephone conference with Andy Anderson; telephone conference with Tom Seymour; telephone conference with Murlene Bullard

Date: Mon Nov 7, 05

Time: 0.25

Activity: Telephone conference with Elsie Teas; telephone conference with John Setty

Date: Thu Nov 10, 05

Time: 1.25

Activity: Telephone conference with Helen Mason; telephone conference with Mrs. Helms; review unpaid claims; review correspondence from Chuck Shanks

Date: Fri Nov 11, 05

Time: 0.25

Activity: Correspondence with John Setty

Date: Tue Nov 15, 05

Time: 2.50

Activity: Correspondence with attorney Kelley; review United HealthCare explanation of benefit forms re non-payment of claims; internet research re United Health Care

Date: Wed Nov 16, 05

Time: 3.25

Activity: Telephone conference with Mrs. Nettles; correspondence with Forrest re United Healthcare; research and draft FRAP 28(j) letter; telephone conference with Murlene Bullard

Date: Fri Nov 18, 05

Time: 1.25

Activity: Correspondence with attorney Piskorski re Nettles; review United HealthCare EOB's; create database re United Healthcare unpaid claims; instruct paralegal re entry of claim data

Date: Mon Nov 21, 05

Time: 2.50

Activity: Correspondence with Forrest and Rogaczewski; review and summarize documents produced by Case; organize file

Date: Tue Nov 22, 05

Time: 3.00

Activity: Draft subpoena for United Healthcare; telephone conference with process server; correspondence with process server; telephone conference with Nicholson; telephone conference with Connie Howard; correspondence with Howard

Date: Wed Nov 23, 05

Time: 0.25

Activity: Correspondence with Betty Keith

Date: Tue Nov 29, 05

Time: 1.75

Activity: Correspondence with Jerry Moorehouse; draft memo to file re United Healthcare; telephone conference with Will Forrest re CNH documents

Date: Wed Nov 30, 05

Time: 3.00

Activity: Prepare for Sixth Circuit argument; review El Paso Motion; summarize Hewitt documents

Date: Thu Dec 1, 05

Time: 1.75

Activity: Telephone conference with Elliot Good, counsel for United Healthcare; telephone conference with Will Forrest; prepare for oral argument

Date: Fri Dec 2, 05

Time: 4.50

Activity: Prepare for oral argument; research law; review letters from Burchfield

Date: Sat Dec 3, 05

Time: 7.50

Activity: Research; prepare for oral argument

Date: Sun Dec 4, 05

Time: 8.50

Activity: Prepare for oral argument

Date: Mon Dec 5, 05

Time: 13.00

Activity: Email to United Healthcare attorney Good; prepare for oral argument; travel to Cincinnati

Date: Tue Dec 6, 05

Time: 12.00

Activity: Prepare for and attend Sixth Circuit argument; travel to Detroit

Date: Thu Dec 8, 05

Time: 0.50

Activity: Telephone conference with John Setty; telephone conference with John Valko

Date: Fri Dec 9, 05

Time: 0.75

Activity: Telephone conference with Ray Rogers; draft deposition Notices

Date: Mon Dec 12, 05

Time: 7.00

Activity: Telephone conference with Elsie Teas; review El Paso Reply Brief; prepare for and attend hearing on Motion to Amend Injunction

Date: Mon Dec 19, 05

Time: 0.75

Activity: Telephone conference with John Setty; input retiree deaths into database

Date: Tue Dec 20, 05

Time: 1.00

Activity: Email Elliot Good re United Healthcare subpoena; telephone conference with Elliot Good; review email from Good; telephone conference with Carl Taylor (twice)

Date: Fri Dec 23, 05

Time: 0.75

Activity: Telephone conference with Ron Hitt; review Judge Edmund's opinion in ArvinMeritor

Date: Wed Dec 28, 05

Time: 1.00

Activity: Telephone conference with Dave Burnett, Wisconsin Vision; draft Notice of Deposition; telephone conference with Mr. Kranowski; review Healthcare Explanations of Benefits

Date: Fri Dec 30, 05

Time: 3.25

Activity: Review El Paso financial statements in connection with Motion to Modify Health Care Plan

Date: Mon Jan 2, 06

Time: 3.50

Activity: Review El Paso financial statements

Date: Tue Jan 3, 06

Time: 4.25

Activity: Telephone conference with John Setty; telephone conference with Marie Metcalf; draft Supplemental Brief on Motion to Modify Injunction; review email from attorney Good

Date: Fri Jan 6, 06

Time: 1.00

Activity: Review email from John Valko; review Wallin Explanation of Benefits; review email from Forrest; email Forrest; telephone conference with Andy Anderson

Date: Mon Jan 9, 06

Time: 1.75

Activity: Correspondence with Mr. Gonsiorowoski; review United HealthCare Explanations of Benefits; telephone conference with Elsie Teas; review attorney Good email; correspondence with attorney Good

Date: Tue Jan 10, 06

Time: 2.00

Activity: Draft, review and revise letter to attorney Good; telephone conference with Murlene Bullard; telephone conference with Ron Hitt; telephone conference with Tom Seymour; telephone conference with Murlene Bullard

Date: Wed Jan 11, 06

Time: 5.00

Activity: Telephone conference with Joe Peet; telephone conference with North Mississippi Medical Center; review Hewitt documents; create document summaries; review United HealthCare Explanations of Benefits

Date: Thu Jan 12, 06

Time: 1.25

Activity: Telephone conference with John Setty; organize file

Date: Fri Jan 13, 06

Time: 2.00

Activity: Telephone conference with Heather Mahan from North Mississippi Medical Center (several times) re Peet; correspondence with Great West

Date: Tue Jan 17, 06

Time: 5.00

Activity: Telephone conference with Sixth Circuit Clerk; review Sixth Circuit Decision; telephone conference with Helen Mason; telephone conference with Tom Seymour; email Seymour; telephone conference with Saggau; email Saggau; correspondence with class representatives (six); telephone conference with Jim Hecker; email Hecker; correspondence with Andy Anderson; correspondence with Kevin Johnson; email John Valko; telephone conference with reporter from Rock Island Argus; correspondence with John Setty

Date: Wed Jan 18, 06

Time: 1.75

Activity: Telephone conference with Elliott Good; telephone conference with Stuart Israel; telephone conference with Sixth Circuit Clerk re mistake in attorney designation; telephone conference with reporters (several) re Decision; review 1990 Group Benefits Plan; email Good

Date: Fri Jan 20, 06

Time: 0.50

Activity: Telephone conference with Ron Hitt; telephone conference with Ray Rogers

Date: Mon Jan 23, 06

Time: 1.00

Activity: Telephone conference with Bob Betker; review El Paso Brief; review Good email

Date: Tue Jan 24, 06

Time: 0.25

Activity: Telephone conference with John Setty

Date: Wed Jan 25, 06

Time: 2.50

Activity: Telephone conference with Dick Sanders; email Sanders; research and draft Surreply Brief to El Paso's Brief

Date: Thu Jan 26, 06

Time: 6.50

Activity: Telephone conference with Karen Nichols; draft, review and revise Surreply Brief; draft Ex Parte Motion; research re release of injunction bond; correspondence with attorney Good

Date: Fri Jan 27, 06

Time: 4.50

Activity: Draft, review and revise Surreply Brief; revise Ex Parte Motion and Order; correspondence with attorney Good re United Health Care subpoena; correspondence with Edelschick re injunction bond; review correspondence from Chuck Shanks re Charles Colley; telephone conference with Ellen Schultz, WSJ

Date: Sat Jan 28, 06

Time: 0.25

Activity: Correspondence with Sandra Rogers re surety bond

Date: Mon Jan 30, 06

Time: 0.75

Activity: Telephone conference with Ron Hitt; telephone conference with Tom Seymour;
review Motion to Extend Time for Motion for Rehearing

Date: Tue Jan 31, 06

Time: 1.25

Activity: Telephone conference with Rogaczewski; review Motion for Rehearing En Banc;
review correspondence from Cahill re Haas

Date: Wed Feb 1, 06

Time: 0.50

Activity: Review Forrest email; draft deposition notices; review February invoice

Date: Thu Feb 2, 06

Time: 0.75

Activity: Review email from Forrest; email Forrest; review list of plan participants; revise
class list re deceased retirees

Date: Sun Feb 12, 06

Time: 2.00

Activity: Review retiree death information; review class lists from El Paso; correspondence
with Forrest

Date: Mon Feb 13, 06

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Mon Feb 20, 06

Time: 3.75

Activity: Telephone conference with Wilbur Montgomery; review El Paso class list; revise
database; email John Grigsby

Date: Tue Feb 21, 06

Time: 0.50

Activity: Review Grigsby email; email Grigsby; telephone conference with Grigsby

Date: Thu Feb 23, 06

Time: 1.25

Activity: Telephone conference with Clerk, Sixth Circuit Court re Response to Petition for
Rehearing En Banc; research re response

Date: Sat Feb 25, 06

Time: 7.50

Activity: Research and draft Brief

Date: Sun Feb 26, 06

Time: 3.00

Activity: Draft, review and revise En Banc Brief

Date: Mon Feb 27, 06

Time: 4.50

Activity: Review El Paso En Banc Brief; research and draft Response

Date: Tue Feb 28, 06

Time: 5.50

Activity: Draft, review and revise En Banc Brief

Date: Wed Mar 1, 06

Time: 8.25

Activity: Draft Waiver and Release re VEBA Fund; email Grigsby; draft, review and revise En Banc Brief

Date: Thu Mar 2, 06

Time: 6.00

Activity: Telephone conference with Bill Jones; draft and revise En Banc Response; telephone conference with Diane Soubly; revise database re deceased retirees

Date: Fri Mar 3, 06

Time: 0.25

Activity: Telephone conference with Mrs. Kramer re Milsap

Date: Wed Mar 8, 06

Time: 0.25

Activity: Revise database re deceased retirees

Date: Sun Mar 12, 06

Time: 0.50

Activity: Review letter re deceased retirees; search Summation re spouse of deceased retiree; correspondence with Sherry Horton

Date: Mon Mar 13, 06

Time: 0.50

Activity: Telephone conference with Elsie Teas; telephone conference with Ronald Hitt

Date: Wed Mar 15, 06

Time: 2.00

Activity: Review correspondence form Forrest re excluded class members; search internet; review documents; telephone conference with Mrs. Dominick

Date: Thu Mar 16, 06

Time: 2.50

Activity: Telephone conference with John Valko; review correspondence; review documents; correspondence with Forrest re class members removed from coverage lists

Date: Fri Mar 17, 06

Time: 0.50

Activity: Review database re recently deceased class members

Date: Tue Mar 21, 06

Time: 0.75

Activity: Telephone conference with Saggau (twice); review letter from National Association of Manufacturers; email Saggau

Date: Wed Mar 22, 06

Time: 0.25

Activity: Telephone conference with John Valko

Date: Fri Mar 24, 06

Time: 0.50

Activity: Telephone conference with Hitt; review email from Dick Sanders; email Sanders

Date: Tue Mar 28, 06

Time: 0.25

Activity: Telephone conference with Richard Mager

Date: Wed Apr 5, 06

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Mon May 15, 06

Time: 3.25

Activity: Telephone conference with John Setty; correspondence with class representatives; correspondence with Valko, Setty, Anderson and Johnson; review depositions; review document database

Date: Fri May 19, 06

Time: 3.00

Activity: Review Summation; revise database; telephone conference with Leonard Meier re Wisconsin Vision; correspondence with Gerardo; correspondence with Santovi; correspondence with Luxem; telephone conference with Jeff Mibrath, Wisconsin Vision; telephone conference with Elsie Teas; telephone conference with John Grigsby

Date: Wed May 24, 06

Time: 3.75

Activity: Prepare for and attend status conference

Date: Tue May 30, 06

Time: 4.00

Activity: Draft memo re El Paso's proposed changes to health care plan; review 1990 Group Benefits Plan; revise database; review Barbour declaration

Date: Tue Jun 6, 06

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Mon Jun 12, 06

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue Jun 13, 06

Time: 0.25

Activity: Telephone conference with retiree (Wills)

Date: Wed Jun 14, 06

Time: 0.25

Activity: Telephone conference with Jim Marshall

Date: Thu Jun 15, 06

Time: 0.50

Activity: Telephone conference with John Valko

Date: Fri Jun 16, 06

Time: 0.25

Activity: Telephone conference with retiree re unpaid health care claim

Date: Mon Jun 19, 06

Time: 0.50

Activity: Prepare for meeting with Case's attorneys

Date: Tue Jun 20, 06

Time: 4.50

Activity: Prepare for meeting; conference with Rich Atwood; conference with Kienbaum, Jim Sites and Tom Fitzgerald

Date: Wed Jun 21, 06

Time: 0.50

Activity: Telephone conference with Alfred Burns; telephone conference with Mrs. Stievers

Date: Thu Jun 22, 06

Time: 0.75

Activity: Correspondence with Kienbaum; review file

Date: Fri Jun 23, 06

Time: 2.25

Activity: Telephone conference with Jim Cichanofsky; telephone conference with Brad McCain re Ed Kzyanovski; review correspondence from Setty re Keller and from Montgomery; correspondence with Kienbaum; review database re unpaid claims

Date: Mon Jun 26, 06

Time: 1.00

Activity: Telephone conference with Henry Malacara; telephone conference with Mr. Bocox; telephone conference with Mr. Dallman; review documents re Mrs. Bushnell

Date: Tue Jun 27, 06

Time: 1.75

Activity: Prepare for and attend status conference

Date: Thu Jun 29, 06

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Wed Jul 5, 06

Time: 0.25

Activity: Telephone conference with John Setty

Date: Fri Jul 7, 06

Time: 1.00

Activity: Correspondence with Forrest re retirees dropped from coverage; telephone conference with Alfred Burns; telephone conference with Tom Fitzgerald

Date: Mon Jul 17, 06

Time: 0.25

Activity: Telephone conference with Tom Fitzgerald re meeting

Date: Fri Jul 21, 06

Time: 0.25

Activity: Telephone conference with Tom Fitzgerald (twice)

Date: Mon Jul 24, 06

Time: 0.25

Activity: Telephone conference with Larry Schram

Date: Tue Jul 25, 06

Time: 1.50

Activity: Review documents re recent class member deaths; enter data; create lists of recent deaths; correspondence with Sherry Horton; correspondence with Forrest re Schram, et al

Date: Wed Jul 26, 06

Time: 1.50

Activity: Telephone conference with Helen Heiland; review and revise document summaries

Date: Tue Aug 1, 06

Time: 0.25

Activity: Telephone conference with Mr. Marshall

Date: Thu Aug 3, 06

Time: 3.75

Activity: Telephone conference with Will Forrest; telephone conference with Nancy Krzanowski; telephone conference with Aspirus Hospital; review files re unpaid United Health care bills; correspondence with Kienbaum re outstanding bills

Date: Fri Aug 4, 06

Time: 0.75

Activity: Review Petition for Cert; correspondence with Saggau; telephone conference with Forrest

Date: Mon Aug 7, 06

Time: 0.75

Activity: Telephone conference with Elsie Teas; review Response to Cert Petition in BVR

Date: Tue Aug 8, 06

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Wed Aug 9, 06

Time: 0.25

Activity: Telephone conference with Saggau (twice)

Date: Mon Aug 14, 06

Time: 0.25

Activity: Telephone conference with Shirley Bone

Date: Tue Aug 15, 06

Time: 0.25

Activity: Telephone conference with Valko; correspondence with Kienbaum; telephone conference with Saggau; correspondence with Burchfield

Date: Wed Aug 16, 06

Time: 0.75

Activity: Telephone conference with Saggau; telephone conference with Mora from Public Interest Group re Supreme Court brief; email Forrest

Date: Thu Aug 17, 06

Time: 1.50

Activity: Telephone conference with Andy Anderson; email Forrest; review Forrest email; Court Rules; correspondence with Clerk of Supreme Court (two) re extension

Date: Fri Aug 18, 06

Time: 1.00

Activity: Telephone conference with Ron Hitt; review and summarize documents

Date: Mon Aug 21, 06

Time: 0.25

Activity: Review Seymour email

Date: Tue Aug 22, 06

Time: 0.25

Activity: Email Seymour; review Seymour email

Date: Wed Aug 23, 06

Time: 0.25

Activity: Telephone conference with Mason

Date: Thu Aug 24, 06

Time: 1.00

Activity: Telephone conference with Coulliard re unpaid medical bills; telephone conference with Tom Fitzgerald; review presentations re administrative changes

Date: Fri Aug 25, 06

Time: 0.75

Activity: Telephone conference with Ron Hitt; correspondence with Sherrick re El Paso proposal

Date: Wed Aug 30, 06

Time: 0.50

Activity: Telephone conference with Saggau; telephone conference with Fitzgerald

Date: Thu Aug 31, 06

Time: 0.25

Activity: Telephone conference with Fitzgerald

Date: Fri Sep 1, 06

Time: 0.25

Activity: Telephone conference with John Valko

Date: Tue Sep 5, 06

Time: 1.25

Activity: Telephone conference with Fitzgerald; telephone conference with Forrest; review pleadings; telephone conference with surviving spouse

Date: Wed Sep 6, 06

Time: 3.00

Activity: Review proposed Stipulation and Order re Exhibit 7; research law re attorney client privilege; conference with SCM and LMS; draft letter to Kienbaum

Date: Thu Sep 7, 06

Time: 0.75

Activity: Telephone conference with LMS and SCM re Exhibit 7

Date: Mon Sep 11, 06

Time: 3.25

Activity: Telephone conference with Kienbaum; telephone conference with Forrest (twice); telephone conference with Ellen Schultz (twice); telephone conference with Elsie Teas; telephone conference with Tom Seymour; telephone conference with Fitzgerald; review proposed plan changes; telephone conference with Bill Jones; research re ethical obligations

Date: Wed Sep 13, 06

Time: 8.25

Activity: Telephone conference with Robert Taylor; prepare for and attend settlement negotiations; telephone conference with Diane Soubly; telephone conference with Saggau (twice); review Kienbaum letter; research ethics re disclosed document

Date: Thu Sep 14, 06

Time: 4.00

Activity: Research re ethics issues; correspondence with Kienbaum; email Kienbaum; telephone conference with El Paso benefits re Glines; review and revise class database

Date: Fri Sep 15, 06

Time: 0.75

Activity: Telephone conference with Bill Jones; create pre-65 Class database

Date: Mon Sep 18, 06

Time: 1.25

Activity: Telephone conference with Tom Fitzgerald; revise database; email Fitzgerald (two); telephone conference with Robert Taylor; telephone conference with Setty

Date: Tue Sep 19, 06

Time: 4.75

Activity: Telephone conference with Will Forrest; review unpaid claims; correspondence with Fitzgerald re UniCare claims; research and draft Appeal Brief; telephone conference with printer; telephone conference with Saggau (twice); telephone conference with Ron Hitt

Date: Wed Sep 20, 06

Time: 10.00

Activity: Research Response to Petition for Certification; attend status conference re benefit changes; draft, revise and review correspondence to Fitzgerald re United Healthcare unpaid claims

Date: Thu Sep 21, 06

Time: 7.50

Activity: Research CNH cert brief

Date: Fri Sep 22, 06

Time: 0.25

Activity: Telephone conference with Saggau

Date: Sat Sep 23, 06

Time: 6.25

Activity: Draft, review and revise Response to Cert Petition

Date: Sun Sep 24, 06

Time: 6.00

Activity: Draft, review and revise Response to Cert Brief

Date: Mon Sep 25, 06

Time: 7.00

Activity: Research and draft Response Brief; telephone conference with Bill Jones

Date: Tue Sep 26, 06

Time: 7.50

Activity: Research, draft and revise Brief; telephone conference with Saggau

Date: Wed Sep 27, 06

Time: 6.25

Activity: Research, draft and revise response to CNH Petition for Cert

Date: Thu Sep 28, 06

Time: 9.50

Activity: Telephone conference with Company attorney Forrest (twice); review and revise Stipulation; research and draft CNH Brief

Date: Fri Sep 29, 06

Time: 3.00

Activity: Draft, review and revise CNH Response

Date: Sun Oct 1, 06

Time: 7.50

Activity: Draft, review and revise CNH Response

Date: Mon Oct 2, 06

Time: 14.00

Activity: Research, draft, review and revise Case opposition; research, draft and revise El Paso Opposition

Date: Tue Oct 3, 06

Time: 13.50

Activity: Draft, review and revise CNH Opposition; draft, review and revise El Paso Opposition; telephone conference with Saggau (several times); telephone conference with Soubly; review Proofs

Date: Wed Oct 4, 06

Time: 9.75

Activity: Correspondence with attorney Soubly; correspondence with printer; draft Certificates of Service; telephone conference with Saggau (several times); draft, review and revise CNH Opposition; draft, review and revise El Paso Opposition

Date: Thu Oct 5, 06

Time: 7.25

Activity: Draft, review, revise and proof CNH Opposition; draft, review, revise and proof El Paso Opposition; telephone conference with Saggau (several times); emails with printer (several); organize file

Date: Fri Oct 6, 06

Time: 0.50

Activity: Telephone conference with Company attorney Joshua Rogaczewski (twice); telephone conference with Ron Hitt

Date: Mon Oct 9, 06

Time: 1.25

Activity: Telephone conference with Elsie Teas; correspondence with class representatives; correspondence with Saggau

Date: Tue Oct 10, 06

Time: 1.50

Activity: Telephone conference with Tom Seymour; telephone conference with Dick Sanders; review summation; correspondence with Forrest; correspondence with Saggau; correspondence with Anderson

Date: Mon Oct 16, 06

Time: 0.50

Activity: Telephone conference with Saggau; telephone conference with John Setty

Date: Mon Oct 23, 06

Time: 0.25

Activity: Telephone conference with Geraldine Klavenga

Date: Tue Oct 24, 06

Time: 0.25

Activity: Telephone conference with John Setty

Date: Fri Oct 27, 06

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Mon Oct 30, 06

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Tue Oct 31, 06

Time: 0.25

Activity: Telephone conference with Leonard Taylor

Date: Wed Nov 1, 06

Time: 2.00

Activity: Telephone conference with Jim Hecker; email to Steve Meisgeier, El Paso attorney re interim plan; telephone conference with John Setty; telephone conference with Steve Meisgeier re interim settlement; review interim settlement proposal

Date: Thu Nov 2, 06

Time: 0.50

Activity: Email to Saggau and Atwood

Date: Tue Nov 7, 06

Time: 2.25

Activity: Telephone conference with Elsie Teas; telephone conference with Wilbur Montgomery; review Supreme Court website re cert petition; telephone conference with John Setty; correspondence with class representatives (six)

Date: Fri Nov 10, 06

Time: 0.50

Activity: Email Saggau and Atwood; telephone conference with Jim Marshall

Date: Fri Nov 17, 06

Time: 0.50

Activity: Email to Kienbaum re status conference; review unpaid medical claims information

Date: Tue Nov 21, 06

Time: 0.50

Activity: Telephone conference with Ms. McKlem re James Vermiere; telephone conference with Steve Meisgeier

Date: Wed Nov 22, 06

Time: 2.25

Activity: Telephone conference with Ron Hitt; telephone conference with Andy Anderson; organize file

Date: Tue Nov 28, 06

Time: 0.50

Activity: Telephone conference with Atwood and Saggau

Date: Wed Nov 29, 06

Time: 0.25

Activity: Telephone conference with Steve Meisgeier

Date: Thu Nov 30, 06

Time: 1.75

Activity: Prepare for and attend status conference

Date: Fri Dec 1, 06

Time: 0.50

Activity: Telephone conference with Jim Hecker; telephone conference with Ron Hitt

Date: Tue Dec 5, 06

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Wed Dec 6, 06

Time: 2.25

Activity: Review class list and social security death index re deceased retirees; review Forrest letter

Date: Thu Dec 7, 06

Time: 0.25

Activity: Telephone conference with John Setty

Date: Fri Dec 8, 06

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Mon Dec 11, 06

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue Dec 12, 06

Time: 3.75

Activity: Telephone conference with Dick Sanders; telephone conference with Jeff Vasch; review various documents re production; add to privilege log; review coverage list; search social security death index

Date: Wed Dec 13, 06

Time: 2.25

Activity: Review class lists; correspondence with Forrest re coverage lists

Date: Thu Dec 14, 06

Time: 6.50

Activity: Telephone conference with Antoinette King; telephone conference with Deborah Lamiosz re Elbert King; review file re proposed modification of health care plan; draft supplemental brief

Date: Fri Dec 15, 06

Time: 7.00

Activity: Telephone conference with Ron Hitt; draft and revise supplemental brief in opposition to motion to modify injunction; review El Paso interrogatories

Date: Sat Dec 16, 06

Time: 2.25

Activity: Review class lists re deceased class members; correspondence with Forrest

Date: Thu Dec 21, 06

Time: 0.50

Activity: Review Class List information from Local 180

Date: Wed Dec 27, 06

Time: 1.50

Activity: Draft interrogatories

Date: Thu Dec 28, 06

Time: 4.25

Activity: Telephone conference with Noel Massey; Draft, review and revise first set of interrogatories

Date: Fri Dec 29, 06

Time: 5.75

Activity: Draft, review and revise first interrogatories to El Paso; prepare exhibits; correspondence with Kienbaum; review documents re interrogatory answers

Date: Sat Dec 30, 06

Time: 3.00

Activity: Draft, review and revise interrogatories

Date: Mon Jan 1, 07

Time: 1.00

Activity: Review documents re answers to interrogatories

Date: Tue Jan 2, 07

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Fri Jan 5, 07

Time: 0.25

Activity: Telephone conference with Ms. Boyles

Date: Mon Jan 8, 07

Time: 1.25

Activity: Telephone conference with Elsie Teas; telephone conference with John Setty; telephone conference with Sharon Boyles; review 1990 Group Benefit Plan re coverage

Date: Tue Jan 9, 07

Time: 0.75

Activity: Telephone conference with Ron Hitt; telephone conference with Sharon Boyles (2)

Date: Tue Jan 16, 07

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Wed Jan 17, 07

Time: 3.00

Activity: Correspondence with Kienbaum

Date: Thu Jan 18, 07

Time: 3.25

Activity: Telephone conference with Chuck Shanks; draft and revise letter to Kienbaum re interrogatories and injunction violations; email Kienbaum; telephone conference with Saggau

Date: Sun Jan 21, 07

Time: 6.00

Activity: Review documents; Draft, review and revise answers to interrogatories

Date: Mon Jan 22, 07

Time: 7.00

Activity: Correspondence with attorney Rogala; review documents; draft, review and revise answers to interrogatories; review Detroit Diesel decision

Date: Tue Jan 23, 07

Time: 5.25

Activity: Draft, review and revise Answers to Interrogatories; correspondence with Rogala; correspondence with Teas

Date: Wed Jan 24, 07

Time: 1.00

Activity: Telephone conference with John Valko (2); email to Valko; review class member death information

Date: Thu Jan 25, 07

Time: 0.25

Activity: Correspondence with Sherry Horton re Alex Varju

Date: Fri Jan 26, 07

Time: 0.50

Activity: Telephone conference with Michele Hallee; review Shanks email and Explanation of Benefits of retirees

Date: Sun Jan 28, 07

Time: 5.25

Activity: Draft Requests for Admissions; review documents

Date: Mon Jan 29, 07

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue Jan 30, 07

Time: 1.00

Activity: Telephone conference with Mrs. Pedder; research re Pactiv headquarters re subpoena

Date: Wed Jan 31, 07

Time: 5.75

Activity: Review documents re history of Tenneco re subpoena to Pactiv; draft document list for subpoena; review documents re Case corporate continuity

Date: Thu Feb 1, 07

Time: 7.25

Activity: Draft subpoena and document list; telephone conference with Forrest; correspondence with Doyle, Vice President of Pactiv; review documents re corporate continuity/Requests for Admissions from CNH; review El Paso subpoena to UAW; telephone conference with Region 4 re subpoena

Date: Fri Feb 2, 07

Time: 1.50

Activity: Prepare Pactiv subpoena for service; telephone conference with Pactiv re Hallee; review and summarize documents

Date: Mon Feb 5, 07

Time: 0.25

Activity: Correspondence with Kienbaum/Burchfield re subpoena

Date: Tue Feb 6, 07

Time: 1.00

Activity: Correspondence with Rogala re Answers to Interrogatories; correspondence with Kienbaum and Burchfield re injunction bond; telephone conference call with Judge Duggan and Forrest re Motion for Administrative Changes

Date: Thu Feb 8, 07

Time: 0.25

Activity: Telephone conference with Lori Rogala

Date: Fri Feb 9, 07

Time: 1.75

Activity: Telephone conference with Lisnich; draft Requests for Admission

Date: Sat Feb 10, 07

Time: 3.25

Activity: Draft Request for Admissions

Date: Sun Feb 11, 07

Time: 7.50

Activity: Draft Requests for Admissions

Date: Mon Feb 12, 07

Time: 8.25

Activity: Telephone conference with Elsie Teas; review documents; draft, review and revise Requests for Admission

Date: Tue Feb 13, 07

Time: 9.00

Activity: Telephone conference with Dick Sanders; telephone conference with Tom Seymour; review documents; draft, review and revise Requests for Admission

Date: Wed Feb 14, 07

Time: 9.50

Activity: Telephone conference with John Valko; telephone conference with Leibling re Pactiv subpoena; draft, review and revise Requests for Admission; review documents

Date: Thu Feb 15, 07

Time: 10.25

Activity: Correspondence with attorney Leibling re Pactiv subpoena; create excel spreadsheet; review documents; draft, review and revise Requests for Admissions; review documents; review Leibling letter

Date: Fri Feb 16, 07

Time: 3.25

Activity: Draft, review and revise Requests for Admissions; review documents

Date: Mon Feb 19, 07

Time: 5.50

Activity: Telephone conference with John Setty; telephone conference with Nicholson; review El Paso Answers to Interrogatories; draft Requests for Admission; review documents re Requests

Date: Tue Feb 20, 07

Time: 10.25

Activity: Telephone conference with Nicholson; review El Paso's Answers to Interrogatories; correspondence with Forrest re Interrogatories; review 1990 Plan provisions; correspondence with Forrest re plan provisions re Motion for Administrative Changes; review and revise Requests for Admission

Date: Wed Feb 21, 07

Time: 10.25

Activity: Telephone conference with Jeff Liebling; telephone conference with Nicholson; review and revise correspondence to Forrest re Motion to Modify Health Care Plan; draft, review and prepare documents and document lists for Requests for Admission; draft Rule 30(b)(6) Notice of Deposition for CNH; draft 30(b)(6) Notice of Deposition for El Paso

Date: Thu Feb 22, 07

Time: 8.50

Activity: Telephone conference with Tom Fitzgerald; review and revise Requests for Admissions; draft document lists for Requests for Admission; review documents for Requests for Admission; draft Notice of Deposition to El Paso; draft Request for Production of Documents to El Paso; correspondence with Edelschick re Requests for Admission; correspondence with Forrest re deposition and Request for Production of Documents; draft Answers to El Paso Interrogatories; review and revise document summaries re damages for Answers to Interrogatories

Date: Fri Feb 23, 07

Time: 3.75

Activity: Draft, review and revise Answers to El Paso's Interrogatories; review and revise document summaries; telephone conference with Nicholson; review Notices of Deposition from El Paso

Date: Sat Feb 24, 07

Time: 8.00

Activity: Draft Response to Motion for Summary Judgment as to CNH Global; review documents

Date: Mon Feb 26, 07

Time: 0.25

Activity: Review letter from Levine

Date: Tue Feb 27, 07

Time: 2.00

Activity: Correspondence with Levine re requests for admission

Date: Wed Feb 28, 07

Time: 1.00

Activity: Telephone conference with Jay Boger and Romanelli; telephone conference with Mike Nicholson(2); review Levine letter re request for admissions

Date: Thu Mar 1, 07

Time: 2.00

Activity: Telephone conference with Mr. Dallman; review documents supporting Requests for Admission

Date: Fri Mar 2, 07

Time: 0.25

Activity: Telephone conference with Nicholson re depositions and UAW subpoenas

Date: Sat Mar 3, 07

Time: 3.50

Activity: Review documents and draft answers to El Paso's Second Set of Interrogatories

Date: Sun Mar 4, 07

Time: 6.00

Activity: Draft, review and revise answers to Interrogatories; correspondence with Forrest re Interrogatories and El Paso's answers to Plaintiffs' Interrogatories; correspondence with Forrest and Edelschick re Pactiv subpoena; review Levine correspondence re requests for admission

Date: Tue Mar 6, 07

Time: 0.25

Activity: Telephone conference with Nicholson

Date: Wed Mar 7, 07

Time: 10.00

Activity: Review documents re requests for admission; annotate Requests for Admissions; correspondence with Levine re requests for admission

Date: Thu Mar 8, 07

Time: 4.50

Activity: Review documents re requests for admissions; annotate requests for admissions; draft, review and revise letter to Levine

Date: Fri Mar 9, 07

Time: 6.50

Activity: Review documents re Requests for admission; annotate requests; revise letter to Levine

Date: Mon Mar 12, 07

Time: 0.50

Activity: Review deposition subpoenas; telephone conference with Elsie Teas

Date: Tue Mar 13, 07

Time: 3.00

Activity: Telephone conference with Ms. Castillo; correspondence with Mr. Johnson; telephone conference with Mr. Colley; review request for production of documents and interrogatories; correspondence with Elsie Teas

Date: Wed Mar 14, 07

Time: 4.75

Activity: Telephone conference with Jeff Liebling re Pactiv subpoena; telephone conference with Kiriaki re deposition; telephone conference with Hungerford re deposition; research accord and satisfaction; correspondence with Class Plaintiffs; telephone conference with John Setty; plan deposition schedule

Date: Thu Mar 15, 07

Time: 0.25

Activity: Telephone conference with Dick Sanders; telephone conference with Jim Reynolds; telephone conference with Margaret Roberts

Date: Fri Mar 16, 07

Time: 0.50

Activity: Correspondence with Boger re depositions

Date: Sat Mar 17, 07

Time: 0.50

Activity: Telephone conference with Castillo; telephone conference with Margaret Roberts

Date: Sun Mar 18, 07

Time: 4.50

Activity: Draft response to emergency motion to quash

Date: Tue Mar 20, 07

Time: 5.25

Activity: Telephone conference with Mike Nicholson; telephone conference with Romanelli and Boger re discovery; telephone conference with Colley; telephone conference with Ed Johnson; draft, review and revise response to motion to quash

Date: Wed Mar 21, 07

Time: 3.00

Activity: Telephone conference with Mrs. Miller; telephone conference with Joyce Bentler; telephone conference with Charles Colley; telephone conference with Paula Castillo; telephone conference with Margaret Roberts; review correspondence from Romanelli re depositions; review documents and depositions re preparation for depositions

Date: Thu Mar 22, 07

Time: 1.25

Activity: Telephone conference with Will Forrest; telephone conference with Ed Johnson; review correspondence from Levine re requests for admission

Date: Fri Mar 23, 07

Time: 6.00

Activity: Telephone conference with Ron Hitt; correspondence with Levine; draft proposed submission re health care plan provisions re El Paso motion to modify plan; review data base document issues; review Castillo and Hungerford documents for depositions; telephone conference with Wayne Hungerford

Date: Sat Mar 24, 07

Time: 3.00

Activity: Organize file; prepare for depositions; review documents; correspondence with Baptist re Rule 30(b)(6) deps; review Forrest letter re damage interrogatories; correspondence with Forrest re damage interrogatories

Date: Sun Mar 25, 07

Time: 6.00

Activity: Prepare files and review documents for depositions; correspondence with Forrest re responses to interrogatories; email Forrest re Tenneco Equipment; review Forrest correspondence re United HealthCare claims; correspondence with retirees whose claims were paid (Keller, Whitham, Ray, Nichols, Boyles, Teas, Montgomery, Brandt, Hardesty, King,); correspondence with Shanks, Sanders, Valko re United HealthCare payments

Date: Mon Mar 26, 07

Time: 10.00

Activity: Telephone conference with Montgomery; review interrogatories; telephone conference with Bentler (2); telephone conference with Colley; prepare for depositions; review documents re Jim Harrison; telephone conference with Nicholson (2); telephone conference with Saggau; research law on admissibility of settlement discussions; email Nicholson; review Forrest email; telephone conference with clerk re motion to quash; revise joint submission to Duggan re motion for administrative changes

Date: Tue Mar 27, 07

Time: 12.00

Activity: Travel to Moline; telephone conferences with Joyce Bentler and Charles Colley; deposition preparation with Joyce Bentler; travel to Woodhull, Illinois; deposition preparation with Charles Colley; draft responses to Interrogatories; telephone conference with Nicholson re El Paso's motion to compel (2); telephone conference with Montgomery re interrogatories

Date: Wed Mar 28, 07

Time: 14.00

Activity: Prepare for and attend Bentler and Colley depositions; draft responses to request for production of documents; telephone conference with Robert Betker re interrogatories; telephone conference with Gary Halsted re interrogatories; travel from Moline to Detroit

Date: Thu Mar 29, 07

Time: 8.25

Activity: Review answers to requests for admission; telephone conference with Nicholson; review El Paso's response to request for production of documents; review UAW's response to motion to compel; telephone conference with Tom Kale; telephone conference with Elsie Teas; telephone conference with Will Forrest; telephone conference with Edward Maynard; draft answers to interrogatories; review motion to extend discovery; review responses to requests for admission; attend El Paso's motion to compel production; conference with Nicholson; telephone conference with Hungerford re deposition

Date: Fri Mar 30, 07

Time: 6.50

Activity: Revise Pactiv protective order; email to Liebling; review answers to request for admissions; telephone conference with Elsie Teas; telephone conference with Gladys Yolton; telephone conference with Ed Maynard; draft, review and revise answers to interrogatories; draft, review and revise response to request for production; correspondence with Levine (2); review Forrest email; draft re notice of Rule 30(b)(6) deposition

Date: Sat Mar 31, 07

Time: 4.50

Activity: Review El Paso document lists; search internet re Case dealers and dealer privatization; correspondence with Forrest

Date: Sun Apr 1, 07

Time: 0.75

Activity: Review responses to requests for admission

Date: Mon Apr 2, 07

Time: 8.25

Activity: Telephone conference with Elsie Teas; telephone conference with Nicholson (2); review documents re Reorganization and pension merger; telephone conference with Edward Johnson; review responses to requests for admission; draft response to motion for extension of discovery cut off; review Hendrick email re document production; correspondence with Hendrick

Date: Tue Apr 3, 07

Time: 11.00

Activity: Telephone conference with Boger; draft, review and revise response to El Paso motion to extend discovery; review documents re Johnson deposition; travel to Terre Haute; conference with Ed Johnson re deposition; conference with Setty and Jones re United Health Care issues; telephone conference with Andy Anderson

Date: Wed Apr 4, 07

Time: 15.00

Activity: Review CNH's responses to Requests for admission; attend Johnson deposition; conference with Bill Jones; travel to Detroit; correspondence with Levine re interrogatory answers

Date: Thu Apr 5, 07

Time: 3.25

Activity: Telephone conference with Nicholson (2); review documents re 1994 Reorganization; email Nicholson; email Nicholson re 1994 Reorganization

Date: Fri Apr 6, 07

Time: 4.00

Activity: Review Kienbaum correspondence; telephone conference with Nicholson (2); telephone conference with Nicholson and Atwood; telephone conference with Kienbaum and Atwood; review response to motion to extend time; review El Paso documents re Tenneco Equipment

Date: Sat Apr 7, 07

Time: 7.50

Activity: Correspondence with Forrest re Keller; correspondence with Joyce Moore; telephone conference with Ms. Moore; review correspondence and emails from Hendrick re El Paso production; review and summarize El Paso documents; correspondence with Hendrick re El Paso production; review Cottrell and Taylor claims; correspondence with Mr Gaujardo

Date: Sun Apr 8, 07

Time: 4.00

Activity: Draft and revise correspondence with Forrest re Cottrell; correspondence with Forrest re terminated participation

Date: Mon Apr 9, 07

Time: 9.75

Activity: Telephone conference with Liebling; telephone conference with Pedro Guajardo; correspondence with Edelschick re Joyce Moore; review responses to request for admission; correspondence with Levine re Rule 30(b)(6) deposition; review email from Hallee; email Hallee; review Pactiv protective order; correspondence with Liebling re protective order; review and summarize El Paso-Tenneco Equipment documents

Date: Tue Apr 10, 07

Time: 6.75

Activity: Telephone conference with Nicholson and Atwood; review Levine letter; review answers to requests for admissions; correspondence with Levine re 30(b)(6) deposition

Date: Wed Apr 11, 07

Time: 3.75

Activity: Review Liebling email; correspondence with Liebling; revise letter to Levine re Requests for Admissions; review El Paso documents

Date: Thu Apr 12, 07

Time: 9.00

Activity: Review El Paso documents and prepare for Rule 30(b)(6) deposition

Date: Fri Apr 13, 07

Time: 8.25

Activity: Review and summarize El Paso documents re Rule 30(b)(6) deposition; email Forrest; email to Hendrick; review Forrest letter; revise Pactiv protective order

Date: Sat Apr 14, 07

Time: 7.00

Activity: Review and summarize El Paso documents re Rule 30(b)(6) deposition; review revised answers to requests for admission

Date: Sun Apr 15, 07

Time: 7.00

Activity: Review and summarize El Paso documents and prepare for Rule 30(b)(6) deposition

Date: Mon Apr 16, 07

Time: 5.25

Activity: Telephone conference with John Setty; review documents; prepare for Christman deposition; summarize documents

Date: Tue Apr 17, 07

Time: 14.00

Activity: Conference with Atwood and Nicholson re Rule 30(b)(6) deposition; prepare for Christman deposition; travel to Chicago

Date: Wed Apr 18, 07

Time: 12.00

Activity: Prepare for and take Christman deposition; travel from Chicago; review information re deceased class members; revise data base

Date: Thu Apr 19, 07

Time: 5.25

Activity: Telephone conference with Forrest; email to Liebling re Pactiv document production; review coverage lists, research death index and revise data base; review Hendrick emails re document production; email Hendrick; correspondence with Sherry Horton; email Horton; telephone conference with Nicholson

Date: Sat Apr 21, 07

Time: 5.00

Activity: Research and draft response to El Paso supplemental brief re administrative changes

Date: Sun Apr 22, 07

Time: 5.50

Activity: Research, draft and revise response to supplemental brief re administrative changes

Date: Mon Apr 23, 07

Time: 12.50

Activity: Telephone conference with Will Forrest; research, review and revise brief re administrative changes; travel to Houston for Pruitt deposition; prepare for Pruitt deposition

Date: Tue Apr 24, 07

Time: 14.50

Activity: Prepare for and take Pruitt Rule 30(b)(6) deposition in Houston; telephone conference with Forrest re discovery order; travel from Houston

Date: Wed Apr 25, 07

Time: 0.25

Activity: Telephone conference with Dallman

Time: 0.25

Activity: Telephone conference with Nicholson

Date: Fri Apr 27, 07

Time: 7.00

Activity: Conference with Nicholson and Atwood; prepare for Pactiv document inspection

Date: Sat Apr 28, 07

Time: 0.50

Activity: Correspondence with Dallman; draft Request for Re-enrollment

Date: Sun Apr 29, 07

Time: 6.50

Activity: Review coverage lists; research death index; revise database; travel to Chicago

Date: Mon Apr 30, 07

Time: 14.50

Activity: Travel from Chicago to Lake Forest; review benefit files at Pactiv in Lake Forest; travel from Lake Forest

Date: Tue May 1, 07

Time: 4.50

Activity: Review Bob King deposition; organize file; correspondence with Liebling; correspondence with Hendrick; review El Paso coverage lists; telephone conference with Ron Hitt

Date: Wed May 2, 07

Time: 0.50

Activity: Conference with Nicholson re Atwood deposition

Date: Thu May 3, 07

Time: 1.00

Activity: Telephone conference with Nicholson (two); review documents re Atwood deposition

Date: Fri May 4, 07

Time: 8.50

Activity: Prepare for and attend Atwood deposition

Date: Mon May 7, 07

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue May 8, 07

Time: 0.50

Activity: Correspondence with Forrest; review documents from Pactiv

Date: Thu May 10, 07

Time: 0.75

Activity: Review El Paso class lists

Date: Fri May 11, 07

Time: 1.25

Activity: Telephone conference with Nicholson; telephone conference with court reporter; review Pactiv documents; correspondence with Liebling

Date: Mon May 14, 07

Time: 0.75

Activity: Review El Paso subpoena; telephone conference with Nicholson; review Leibling email

Date: Tue May 15, 07

Time: 0.75

Activity: Telephone conference with Mike Nicholson; review Forrest correspondence (two) re United Health Care claims

Date: Wed May 16, 07

Time: 0.75

Activity: Conference with Nicholson; review subpoena and IEB minutes; summarize documents

Date: Thu May 17, 07

Time: 4.50

Activity: Review class lists; correspondence with Forrest re El Paso class lists; telephone conference with Nicholson; review pleadings re El Paso subpoena to UAW; email Nicholson

Date: Fri May 18, 07

Time: 2.25

Activity: Telephone conference with Alliance Collection Agency re Krzanowski; telephone conference with Nicholson; review Nicholson objections; telephone conference with Nancy Krzanowski; telephone conference with Marshfield Clinic and Nancy Krzanowski; organize file

Date: Mon May 21, 07

Time: 1.25

Activity: Correspondence with Forrest and Rogaczewski re discovery; correspondence with Levine re Moore; correspondence with Hendrick re Rule 30(b)(6) witness; telephone conference with Hitt

Date: Tue May 22, 07

Time: 0.25

Activity: Review Levine letter re Joyce Moore

Date: Wed May 23, 07

Time: 1.25

Activity: Telephone conference with Nicholson; telephone conference with Rogaczewski; review Levine and Hallee email; correspondence with Joyce Moore

Date: Thu May 24, 07

Time: 2.00

Activity: Review Forrest letter to Nicholson; review Forrest letter re class issues; correspondence with Forrest/Rogaczewski re discovery issues; review Hendrick letter; correspondence with Hendrick re Rule 30(b)(6) deposition

Date: Fri May 25, 07

Time: 1.00

Activity: Telephone conference with Mike Nicholson (two); review and update class list

Date: Sat May 26, 07

Time: 5.50

Activity: Draft, review and revise Motion for Summary Judgment

Date: Sun May 27, 07

Time: 4.00

Activity: Review depositions; summarize documents; research and draft motion for summary judgment

Date: Tue May 29, 07

Time: 8.25

Activity: Telephone conference with Holly re Krzanowski; review corrections to Christman 30(b)(6) deposition; review documents and exhibits re motion for summary judgment; draft brief in support of motion for summary judgment

Date: Wed May 30, 07

Time: 4.75

Activity: Research, draft and revise summary judgment brief

Date: Fri Jun 1, 07

Time: 9.25

Activity: Telephone conference with Burchfield; telephone conference with Rogaczewski (2); telephone conference with Forrest; draft and revise summary judgment brief; organize exhibits

Date: Sat Jun 2, 07

Time: 4.50

Activity: Draft, review and revise summary judgment brief; organize exhibits

Date: Sun Jun 3, 07

Time: 6.00

Activity: Draft, review and revise summary judgment brief

Date: Mon Jun 4, 07

Time: 11.50

Activity: Telephone conference with Christine Hamilton re Crist Johnson; research, draft and revise summary judgment brief; draft ex parte motion; correspondence with counsel

Date: Tue Jun 5, 07

Time: 2.00

Activity: Telephone conference with John Valko; review and revise class list; review pleadings filed by El Paso; telephone conference with clerk

Date: Wed Jun 6, 07

Time: 2.25

Activity: Telephone conference with Andy Anderson; review class lists; revise class lists; review CNH motion for summary judgment; telephone conference with clerk re summary judgment brief

Date: Thu Jun 7, 07

Time: 0.25

Activity: Telephone conference with Nicholson

Date: Sat Jun 9, 07

Time: 0.50

Activity: Review motion to strike demand for emotional distress damages

Date: Sun Jun 10, 07

Time: 5.75

Activity: Prepare for oral argument; research legal issues; draft motion to compel Rule 30(b)(6) witness

Date: Mon Jun 11, 07

Time: 6.00

Activity: Research and draft motion to compel production of Rule 30(b)(6) witness; telephone conversation with Elsie Teas

Date: Tue Jun 12, 07

Time: 11.25

Activity: Telephone conference with Rogaczewski; prepare for oral argument; telephone conference with Setty; correspondence with Michele Hallee re Joyce Moore

Date: Thu Jun 14, 07

Time: 1.00

Activity: Telephone conference with John Valko; telephone conference with Nicholson; correspondence with class representatives

Date: Fri Jun 15, 07

Time: 0.25

Activity: Correspondence with Saggau

Date: Sat Jun 16, 07

Time: 4.50

Activity: Research and draft response to motion to strike

Date: Mon Jun 18, 07

Time: 9.00

Activity: Telephone conference with Forrest; telephone conference with John Setty; telephone conference with Kevin Hendrick re Rule 30(b)(6) motion; research and draft response to motion to strike

Date: Sun Jun 17, 07

Time: 1.50

Activity: Research and draft brief

Date: Tue Jun 19, 07

Time: 0.50

Activity: Telephone conference with Forrest; review email; telephone conference with Nicholson

Date: Thu Jun 21, 07

Time: 2.00

Activity: Draft, review and revise brief in response to motion to strike

Date: Fri Jun 22, 07

Time: 0.50

Activity: Review Hendrick email; telephone conference with Kevin Hendrick

Date: Mon Jun 25, 07

Time: 3.75

Activity: Telephone conference with Mike Nicholson(2); telephone conference with Ron Hitt; telephone conference with Joyce Moore; draft and revise response to El Paso's motion to strike

Date: Tue Jun 26, 07

Time: 0.25

Activity: Telephone conference with Nicholson

Date: Thu Jul 5, 07

Time: 3.50

Activity: Draft, review and revise response to motion to strike damage claims

Date: Fri Jul 6, 07

Time: 8.00

Activity: Research, draft and revise brief in opposition to motion to strike

Date: Mon Jul 9, 07

Time: 2.00

Activity: Telephone conference with Elsie Teas; draft, review and revise response to motion to strike

Date: Tue Jul 10, 07

Time: 4.50

Activity: Review El Paso documents; correspondence with Hendrick re 30(b)(6) documents

Date: Wed Jul 11, 07

Time: 2.50

Activity: Research, draft and revise response to motion to strike

Date: Thu Jul 12, 07

Time: 7.50

Activity: Research and draft response to motion

Date: Fri Jul 13, 07

Time: 3.25

Activity: Draft, review and revise brief in opposition to motion to strike

Date: Sat Jul 14, 07

Time: 5.50

Activity: Draft, review and revise brief in response to motion to strike

Date: Sun Jul 15, 07

Time: 2.00

Activity: Draft, review and revise response to petition to strike; review motion to enforce cap; organize file

Date: Mon Jul 16, 07

Time: 8.50

Activity: Telephone conference with Wilbur Montgomery; draft, review and revise response to motion to strike; telephone conference with Forrest (2); draft response to motion for liability as to FAS 106 letter

Date: Tue Jul 17, 07

Time: 5.00

Activity: Draft response to motion for summary judgment re FAS 106 letter

Date: Thu Jul 19, 07

Time: 6.50

Activity: Telephone conference with Nicholson re document issues; search for and organize documents; research and draft response to motion for SJ re FAS106 issue

Date: Fri Jul 20, 07

Time: 6.00

Activity: Draft, review and revise response to motion re FAS 106

Date: Sat Jul 21, 07

Time: 6.50

Activity: Draft, review and revise response to motion for summary judgment as to FAS 106 letter

Date: Sun Jul 22, 07

Time: 6.00

Activity: Draft, review and revise brief in response to FAS 106 motion

Date: Mon Jul 23, 07

Time: 6.00

Activity: Draft, review and revise response to brief on FAS 106 issue

Date: Tue Jul 24, 07

Time: 7.75

Activity: Telephone conference with Nickelhoff; telephone conference with Rogaczewski; draft, review and revise response to motion re FAS 106 issue

Date: Wed Jul 25, 07

Time: 8.00

Activity: Draft, review and revise brief

Date: Thu Jul 26, 07

Time: 7.75

Activity: Telephone conference with Ron Hitt; telephone conference with El Paso attorney; review stip and order; research, draft and revise brief

Date: Fri Jul 27, 07

Time: 7.50

Activity: Draft, review and revise brief in opposition to Motion for Summary Judgment re FAS 106 letter; organize documents; review transcripts

Date: Sun Jul 29, 07

Time: 3.75

Activity: Draft, review and revise response to Motion for Summary Judgment as to FAS 106 letter

Date: Mon Jul 30, 07

Time: 2.50

Activity: Draft, review revise and finalize response to Motion for Summary Judgment re FAS 106 issue; organize exhibits

Date: Tue Jul 31, 07

Time: 0.25

Activity: Review email from Sanders; email to Sanders re status

Date: Wed Aug 1, 07

Time: 0.50

Activity: Telephone conference with Hendrick re Rule 30(b)(6)

Date: Thu Aug 2, 07

Time: 0.25

Activity: Telephone conference with El Paso attorney

Date: Fri Aug 3, 07

Time: 3.50

Activity: Telephone conference with El Paso counsel; draft stipulation; review El Paso documents; correspondence with Hendrick re Rule 30(b)(6) witness

Date: Mon Aug 6, 07

Time: 10.25

Activity: Draft joint statement of unresolved issues; email Hendrick; draft Plaintiffs' position re unresolved issues; review El Paso's Motion for Summary Judgment; correspondence with Forrest; draft amended response to El Paso's motion for summary judgment as to FAS 106 issue

Date: Tue Aug 7, 07

Time: 7.75

Activity: Telephone conference with Nicholson; draft and revise joint list of unresolved issues; revise and file response to motion to compel; research and draft response to Motion for Summary Judgment; review Zouhary decision

Date: Wed Aug 8, 07

Time: 9.50

Activity: Research, draft and revise response to El Paso Motion for Summary Judgment

Date: Thu Aug 9, 07

Time: 9.50

Activity: Telephone conference with Anderson; draft, review and revise response to Motion for Summary Judgment; prepare for and attend hearing on motion to Compel; conference with Atwood and Nicholson re Rule 30(b)(6) deposition

Date: Fri Aug 10, 07

Time: 7.75

Activity: Telephone conference with Michelle Hallee; correspondence with Joyce Miller; telephone conference with John Setty; research and draft brief

Date: Sat Aug 11, 07

Time: 6.00

Activity: Draft, review and revise response to El Paso Motion for Summary Judgment

Date: Tue Aug 14, 07

Time: 2.00

Activity: Draft, review and revise response to El Paso's Motion for Summary Judgment

Date: Wed Aug 15, 07

Time: 10.25

Activity: Telephone conference with John Valko; draft discovery order; email Hendrick; review revised order; draft, review and revise response to Motion for Summary Judgment

Date: Thu Aug 16, 07

Time: 10.25

Activity: Draft, review and revise response to El Paso' motion for summary judgment

Date: Fri Aug 17, 07

Time: 7.25

Activity: Review Hendrick email; email to Hendrick; revise discovery order; draft, review and revise response to motion for summary judgment on vesting; research alter ego law

Date: Sat Aug 18, 07

Time: 7.50

Activity: Review CNH Motion for summary judgment; review documents; research and draft response to CNH motion for summary judgment

Date: Sun Aug 19, 07

Time: 6.00

Activity: Research and draft response to CNH's Motion for Summary Judgment; email to Rogaczewski

Date: Tue Aug 21, 07

Time: 8.50

Activity: Telephone conference with Cyral Boyles; correspondence with Michele Hallee re Moore; draft response to CNH motion for summary judgment

Date: Wed Aug 22, 07

Time: 9.25

Activity: Draft, review and revise response to CNH motion for summary judgment; review CPA letter

Date: Thu Aug 23, 07

Time: 10.00

Activity: Telephone conference with Gerald Johnson; research, draft and revise response to CNH motion for summary judgment

Date: Fri Aug 24, 07

Time: 8.75

Activity: Draft, review and revise response to CNH motion for summary judgment

Date: Sat Aug 25, 07

Time: 6.75

Activity: Draft, review and revise response to motion for summary judgment

Date: Sun Aug 26, 07

Time: 3.50

Activity: Draft, review and revise response to CNH motion for summary judgment

Date: Mon Aug 27, 07

Time: 19.00

Activity: Telephone conference with Nicholson; research; draft, review and revise response to CNH motion for summary judgment; correspondence with Rogaczewski and Forrest

Date: Tue Aug 28, 07

Time: 2.50

Activity: Organize file; review retiree death information; draft ex parte motion and order; research Rule 56 bad faith sanctions

Date: Wed Aug 29, 07

Time: 2.00

Activity: Telephone conference with Hecker; email to Hecker; organize war room; review files

Date: Thu Aug 30, 07

Time: 0.50

Activity: Correspondence with Forrest; telephone conference with Wilbur Montgomery

Date: Sat Sep 1, 07

Time: 7.00

Activity: Draft motion and brief to extend preliminary injunction; review El Paso's response to motion for summary judgment; research obligations of assignor to contract

Date: Tue Sep 4, 07

Time: 8.25

Activity: Telephone conference with Dick Sanders; review El Paso's response to motion for summary judgment; review Matkov declaration; review Thomas Evans documents; telephone conference with Forrest; email Forrest and Rogaczewski; draft stipulation; review Matkov documents

Date: Wed Sep 5, 07

Time: 7.00

Activity: Telephone conference with Santovi; emails to Rogaczewski and Forrest; review

Matkov documents; revise and file stipulation and order for extension; telephone conference with Hitt

Date: Thu Sep 6, 07

Time: 1.00

Activity: Telephone conference with Setty; telephone conference with Leonard Taylor; telephone conference with Hecker; telephone conference with Wistedt

Date: Fri Sep 7, 07

Time: 2.50

Activity: Telephone conference with Jim Marshall; telephone conference with John Valko; review Judge Cook's sanctions; telephone conference with Hendricks; review Massey-Ferguson pleadings and depositions; email to Setty

Date: Mon Sep 10, 07

Time: 9.25

Activity: Telephone conference with Elsie Teas; telephone conference with John Setty; telephone conference with Mrs. Bester; research and draft reply to El Paso's opposition to motion for summary judgment; review Hendrick email; review El Paso documents; Pruitt deposition exhibits; correspondence with Hendrick

Date: Tue Sep 11, 07

Time: 2.25

Activity: Telephone conference with Bill Jones; finish correspondence with Hendrick; search for Bert Neece location

Date: Wed Sep 12, 07

Time: 0.25

Activity: Telephone conference with Dennis Galloway

Date: Thu Sep 13, 07

Time: 1.00

Activity: Research and draft reply to El Paso opposition

Date: Fri Sep 14, 07

Time: 6.50

Activity: Research and draft reply to El Paso's opposition to summary judgment

Date: Sat Sep 15, 07

Time: 7.50

Activity: Draft, review and revise reply to El Paso's motion for summary judgment

Date: Mon Sep 17, 07

Time: 11.50

Activity: Research and draft reply brief

Date: Tue Sep 18, 07

Time: 13.50

Activity: Research, draft and revise reply brief in opposition to El Paso's response; review documents and organize exhibits

Date: Wed Sep 19, 07

Time: 5.75

Activity: Draft ex parte motion to file overlong brief; organize file; telephone conference with Nicholson; telephone conference with Hitt; telephone conference with Gerardo; review CNH opposition to motion for summary judgment; research; correspondence with Forrest; create query re post-10/3/93 retirees; review file re Neece deposition; review Sheer's discovery order; email to Nicholson

Date: Thu Sep 20, 07

Time: 6.25

Activity: Telephone conference with court reporter/process server; review CNH response to motion for summary judgment; research and draft reply

Date: Fri Sep 21, 07

Time: 6.25

Activity: Telephone conference with Valko; draft, review and revise reply to CNH's opposition to summary judgment

Date: Sat Sep 22, 07

Time: 8.00

Activity: Research and draft reply to CNH's opposition

Date: Mon Sep 24, 07

Time: 9.00

Activity: Draft, review and revise reply to CNH opposition to motion for summary judgment

Date: Tue Sep 25, 07

Time: 12.25

Activity: Draft, review and revise reply to CNH's opposition to plaintiffs' motion for summary judgment; organize documents; file reply

Date: Wed Sep 26, 07

Time: 3.50

Activity: Organize file; draft ex parte motion and order; review El Paso response to motion to extend injunction; correspondence with excluded class members; create form; oversee mailing

Date: Thu Sep 27, 07

Time: 1.50

Activity: Telephone conference with Ron Hitt; review Hendrick emails; email to Hendrick
(2)

Date: Fri Sep 28, 07

Time: 4.75

Activity: Review email from Hendrick(2); email to Hendrick(2); research and draft reply in support of motion to extend injunction

Date: Sat Sep 29, 07

Time: 6.25

Activity: Research, draft and revise reply in support of motion to expand injunction

Date: Mon Oct 1, 07

Time: 8.00

Activity: Research, draft, review and revise reply to motion to extend injunction; review questionnaire answers; review Hendrick email (several); email to Hendrick (several); review reorganization documents re assets

Date: Tue Oct 2, 07

Time: 9.75

Activity: Telephone conference with Nicholson; research, draft, review and revise reply re motion to extend injunction; draft objections to discovery order; review questionnaire answers; email to Grigsby

Date: Wed Oct 3, 07

Time: 12.50

Activity: Draft, review and revise objections to Magistrate Scheer's order; telephone conference with Nicholson; attend hearing on motion to extend injunction; telephone conference with Nicholson and Sherrick; prepare for El Paso document production; travel to Houston; telephone conference with Andy Anderson; review Prater decision

Date: Thu Oct 4, 07

Time: 16.00

Activity: Inspect documents at El Paso in Houston; travel from Houston

Date: Fri Oct 5, 07

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon Oct 8, 07

Time: 2.00

Activity: Telephone conference with Elsie Teas; telephone conference with Hecker; telephone conference with Sanders; telephone conference with Valko; telephone conference with Setty; telephone conference with Nicholson (2)

Date: Tue Oct 9, 07

Time: 3.50

Activity: Organize files; review and revise class lists

Date: Wed Oct 10, 07

Time: 0.75

Activity: Telephone conference with Hendrick; review Hendrick email; email to Hendrick; review Seymour email

Date: Thu Oct 11, 07

Time: 2.00

Activity: Telephone conference with Seymour; telephone conference with Mrs. Bester; telephone conference with Dennis Galloway; telephone conference with Fred Mock; review email from Grigsby; email to Grigsby; prepare list for Grigsby; update class list

Date: Fri Oct 12, 07

Time: 1.75

Activity: Telephone conference with Hitt; review email from Grigsby; review class lists

Date: Sat Oct 13, 07

Time: 3.00

Activity: Review Class lists and death index; review El Paso documents re Neece deposition

Date: Mon Oct 15, 07

Time: 15.00

Activity: Email class list to Grigsby; telephone conference with Setty; email to Setty; review documents and prepare for Neece deposition; travel to Houston

Date: Tue Oct 16, 07

Time: 17.00

Activity: Prepare for and take Neece's deposition; travel from Houston

Date: Wed Oct 17, 07

Time: 1.00

Activity: Telephone conference with Nickelhoff; telephone conference with Atwood; review decision re post Oct 1994 retirees

Date: Thu Oct 18, 07

Time: 4.75

Activity: Telephone conference with Jack Eyman; telephone conference with Magrecke; search internet to locate post October 1993 retirees; create data base of post October 1993 retirees; telephone conference with Saggau; correspondence with Forrest re injunction; email to Saggau; Sanders; Valko and Setty; correspondence with class plaintiffs (6); revise and update data base re deaths

Date: Fri Oct 19, 07

Time: 0.75

Activity: Telephone conference with Mr. Sanford; telephone conference with Mr. Terrio; telephone conference with Andy Anderson; email to Valko

Date: Sun Oct 21, 07

Time: 0.50

Activity: Organize file

Date: Mon Oct 22, 07

Time: 5.50

Activity: Telephone conference with Montgomery; review class lists; correspondence with Forrest; telephone conference with James Griffin; telephone conference with Elsie Teas; review El Paso 2007 enrollment worksheet; draft, review and revise settlement term sheet

Date: Tue Oct 23, 07

Time: 3.25

Activity: Telephone conference with Dick Sanders; telephone conference with Wonsil; review and revise settlement proposal; email to Saggau; email to Hecker; review documents

Date: Wed Oct 24, 07

Time: 7.75

Activity: Telephone conference with Ron Hitt; conference with Nicholson, Saggau and Nickelhoff; review documents re FAS 106 issue and Rule 30(b)(6) deposition; review miscellaneous documents

Date: Thu Oct 25, 07

Time: 0.75

Activity: Correspondence with excluded class members; telephone conference with Alliance collection re Krzanowski

Date: Fri Oct 26, 07

Time: 3.50

Activity: Telephone conference with Nicholson and Nickelhoff (twice); telephone conference with Gerrardo; review Valko/Betchal email; correspondence with Forrest; telephone conference with Jim Clifford

Date: Mon Oct 29, 07

Time: 6.50

Activity: Telephone conference with Nicholson; telephone conference with John Rotkis; review documents, draft chronology; telephone conference with Petrowski; email to Saggau; conference with Nickelhoff, Nicholson and Bill Hoffman; review Forrest letter

Date: Tue Oct 30, 07

Time: 0.75

Activity: Telephone conference with George Lisnich; email to Valko re post 10-3-93 retirees; organize file

Date: Wed Oct 31, 07

Time: 3.25

Activity: Telephone conference with Ron Zabrok; review documents; prepare for conference with Shoemaker

Date: Thu Nov 1, 07

Time: 8.25

Activity: Prepare for and attend meeting with Nicholson, Nickelhoff and Shoemaker re Rule 30(b)(6)

Date: Fri Nov 2, 07

Time: 4.00

Activity: Telephone conference with Saggau; telephone conference with Hecker; review documents and prepare chronology and index documents for Shoemaker Rule 30(b)(6) deposition re Case, Mack, Caterpillar, Maytag, Bendix, etc.; telephone conference with Wertheimer re Bendix; telephone conference with Saggau re settlement proposal

Date: Mon Nov 5, 07

Time: 1.50

Activity: Telephone conference with Nicholson; telephone conference with Nickelhoff; draft chronology for Bendix

Date: Tue Nov 6, 07

Time: 4.50

Activity: Telephone conference with Nicholson; review Forrest letter and attached lists; review database re post October 1993 retirees; correspondence with Forrest; prepare Motor Wheel Mendota binder; prepare Maytag binder

Date: Wed Nov 7, 07

Time: 5.50

Activity: Conference with Nicholson and Nickelhoff; prepare documents for Rule 30(b)(6) deposition; review Forrest letter; review database and files to reply to Forrest letter

Date: Thu Nov 8, 07

Time: 3.25

Activity: Telephone conference with Gerrardo; telephone conference with Nicholson re document production; correspondence with Forrest (two)

Date: Fri Nov 9, 07

Time: 1.75

Activity: Draft Mack Truck Approach Chronology; telephone conference with Nickelhoff, Nicholson and Saggau re Rule 30(b)(6) deposition; telephone conference with Otto Hacker

Date: Sun Nov 11, 07

Time: 7.50

Activity: Conference with Shoemaker, Nicholson and Nickelhoff

Date: Mon Nov 12, 07

Time: 2.25

Activity: Telephone conference with James Turecek; telephone conference with Elsie Teas; telephone conference with Gerald Johnson; telephone conference with Pat West (Ramon); telephone conference with Nicholson; research re FAS

Date: Tue Nov 13, 07

Time: 6.00

Activity: Prepare for Shoemaker Rule 30(b)(6) deposition with Shoemaker, Nicholson and Nickelhoff

Date: Wed Nov 14, 07

Time: 9.25

Activity: Prepare for and attend Shoemaker deposition

Date: Thu Nov 15, 07

Time: 2.25

Activity: Telephone conference with Tom Seymour; telephone conference with Dennis Galloway; telephone conference with Lawrence Pike; review Benefit Service Center letter; telephone conference with Helen Heiland; telephone conference with Judy Modrow; telephone conference with Gary Wagner; telephone conference with Lorine Thompson; review CNH Supplemental Brief

Date: Fri Nov 16, 07

Time: 2.00

Activity: Draft letter to Post October 3, 1993 retirees; correspondence with Forrest; conference with Nicholson; review CNH Brief re supplemental authority; review GM/UAW Memorandum of Agreement; telephone conference with Jody, Duggan's court reporter; review hearing transcript; telephone conference with Ms. Lyndell Smith

Date: Sun Nov 18, 07

Time: 6.00

Activity: Prepare for oral argument; draft Response to CNH Supplemental Brief

Date: Mon Nov 19, 07

Time: 13.00

Activity: Prepare for oral argument; research and draft Response to CNH Supplemental Brief; review and draft Response to El Paso Supplemental Brief

Date: Tue Nov 20, 07

Time: 10.00

Activity: Prepare for and attend oral argument; draft, review and revise Response to El Paso Supplemental Brief

Date: Wed Nov 21, 07

Time: 2.75

Activity: Organize file; telephone conference with Nickelhoff; email to Nickelhoff; telephone conference with Setty; telephone conference with Hitt; telephone conference with Valko; correspondence with Helen Heiland; correspondence with class members re reinstatement

Date: Fri Nov 23, 07

Time: 2.25

Activity: Telephone conference with Mrs. Pike; telephone conference with Lorice Thomas; organize file; summarize recent documents; telephone conference with Medicare and social Security; telephone conference with Victoria Leszczynski

Date: Mon Nov 26, 07

Time: 3.00

Activity: Telephone conference with John Rotkis; correspondence with Forrest re post 10/3/94 retirees; review unpaid claim documents re United American; search for class members

Date: Tue Nov 27, 07

Time: 5.75

Activity: Telephone conference with Stephanie re Margaret Wilkes; telephone conference with Darlene Stewart re Wilkes; telephone conference with Dick Sanders; review United HealthCare claim denials; review Nickelhoff email (twice); email to Nickelhoff; review CNH supplemental brief; review United Health Care claim databases

Date: Wed Nov 28, 07

Time: 5.25

Activity: Telephone conference with Jim Hecker; review deposition transcripts re response to CNH supplemental brief; review Krzanowski claims data

Date: Thu Nov 29, 07

Time: 1.25

Activity: Review and enter data re retiree deaths; telephone conference with Sandra Rusk

Date: Fri Nov 30, 07

Time: 1.50

Activity: Telephone conference with Lorice Thompson; review deposition transcripts re response to supplemental brief; review Cotrell documents; telephone conference with Tremmel

Date: Sun Dec 2, 07

Time: 4.50

Activity: Review unpaid United HealthCare claims

Date: Mon Dec 3, 07

Time: 5.50

Activity: Review Krzanowski claims; organize file; oversee scanning of depositions; review depositions and deposition exhibits

Date: Tue Dec 4, 07

Time: 6.25

Activity: Telephone conference with Anderson; telephone conference with Stewart; organize file

Date: Wed Dec 5, 07

Time: 8.00

Activity: Draft, review and revise response to CNH post hearing brief; organize file

Date: Thu Dec 6, 07

Time: 9.00

Activity: Research and draft response to post hearing brief

Date: Fri Dec 7, 07

Time: 1.00

Activity: Draft, review and revise response to post hearing brief

Date: Mon Dec 10, 07

Time: 4.00

Activity: Research, draft and revise response to CNH post hearing brief; review proposed order; email to Ankers; organize depositions and exhibits; organize file

Date: Tue Dec 11, 07

Time: 0.25

Activity: Summarize documents; organize file

Date: Wed Dec 12, 07

Time: 0.50

Activity: Review depositions and deposition exhibits

Date: Thu Dec 13, 07

Time: 3.50

Activity: Telephone conference with Valko; review and organize pleading files; review and organize United HealthCare files

Date: Mon Dec 17, 07

Time: 0.75

Activity: Review file re Reese deposition exhibits; correspondence with Forrest

Date: Tue Dec 18, 07

Time: 0.25

Activity: Correspondence with Forrest re Lorine Thompson

Date: Wed Dec 19, 07

Time: 0.75

Activity: Review depositions and deposition exhibits

Date: Thu Dec 20, 07

Time: 1.25

Activity: Correspondence with Forrest; review discovery materials

Date: Fri Dec 21, 07

Time: 0.75

Activity: Telephone conference with Ron Hitt; review deposition and exhibit issues

Date: Wed Dec 26, 07

Time: 3.50

Activity: Review El Paso's post hearing brief and Hoffman deposition; telephone conference with Nickelhoff (twice); telephone conference with Nicholson; research admissibility of depositions from other cases

Date: Thu Dec 27, 07

Time: 3.00

Activity: Telephone conference with Nickelhoff; review Hoffman deposition; review Woods protective order; correspondence with Forrest; review Nickelhoff emails

Date: Fri Dec 28, 07

Time: 8.25

Activity: Telephone conference with Nickelhoff; review Hoffman deposition; review Anderson, Casstevens, Cabrerros and Williams depositions; review documents; research and draft response to Supplemental Exhibit

Date: Sun Dec 30, 07

Time: 9.50

Activity: Research, draft, review, revise and file Response to Supplemental Exhibit

Date: Mon Dec 31, 07

Time: 0.50

Activity: Telephone conference with Sanders; telephone conference with Ron Hitt

Date: Wed Jan 2, 08

Time: 3.75

Activity: Telephone conference with Anderson; email to Valko; correspondence with Forrest re post October 3, 1993 Class Members; telephone conference with Karen Nichols; telephone conference with Don Nelson; telephone conference with Dick Sanders; telephone conference with Lorice Thompson; telephone conference with Nicholson; review reply brief

Date: Thu Jan 3, 08

Time: 8.25

Activity: Telephone conference with Davidson; telephone conference with Nickelhoff (twice); review Wood Motion for Contempt; telephone conference with Seymour; telephone conference with John Valko; telephone conference with Hoffman; telephone conference with Kevin Johnson; telephone conference with John Setty; telephone conference with Gladys Yolton; telephone conference with Mike Nicholson; draft motion to close record

Date: Fri Jan 4, 08

Time: 7.00

Activity: Telephone conference with Nicholson; draft, revise and file Motion to Close Record

Date: Sat Jan 5, 08

Time: 2.00

Activity: Draft, review and revise Motion to Close Record

Date: Mon Jan 7, 08

Time: 1.00

Activity: Correspondence with Kienbaum and Burchfield re bond; draft stipulated order

Date: Tue Jan 8, 08

Time: 2.00

Activity: Telephone conference with Nickelhoff; review El Paso response; review Nickelhoff-Forrest correspondence; review discovery issues

Date: Wed Jan 9, 08

Time: 0.50

Activity: Telephone conference with Nickelhoff

Date: Mon Jan 14, 08

Time: 3.25

Activity: Email to Ralph Gaeto; telephone conference with Andy Anderson; telephone conference with Kevin Johnson; email to John Grigsby; telephone conference with Ms. McLain; telephone conference with Harold E. Brown; telephone conference with Harold C. Brown; correspondence with Harold Brown; review correspondence from Forrest; review correspondence from Local 180 re class members; revise class data base

Date: Tue Jan 15, 08

Time: 2.50

Activity: Telephone conference with John Setty; review El Paso Response to Motion to Close Record; draft reply

Date: Wed Jan 16, 08

Time: 8.50

Activity: Research and draft Reply to Motion to Close Record; telephone conference with Fred Mock

Date: Thu Jan 17, 08

Time: 6.00

Activity: Research and draft Reply in Support of Motion to Close Record

Date: Fri Jan 18, 08

Time: 8.00

Activity: Research, draft and revise Reply Brief

Date: Sat Jan 19, 08

Time: 0.50

Activity: Prepare and file Reply Brief

Date: Mon Jan 21, 08

Time: 1.25

Activity: Telephone conference with Nicholson; review and revise class lists re deceased class members; review Strictly Retired newsletter; review Sanders email

Date: Tue Jan 22, 08

Time: 1.00

Activity: Telephone conference with Chuck Shanks; review Detroit Diesel response to Motion for Sanctions; review emails from Setty

Date: Wed Jan 23, 08

Time: 0.75

Activity: Telephone conference with Nickelhoff; telephone conference with Vandorcoeur; email to Nickelhoff

Date: Thu Jan 24, 08

Time: 1.00

Activity: Telephone conference with Mrs. Boyd; telephone conference with Nickelhoff (twice); email to Grigsby re VEBA distribution

Date: Fri Jan 25, 08

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon Jan 28, 08

Time: 1.25

Activity: Telephone conference with Dick Sanders; review reply brief in Detroit Diesel litigation; email to Kennedy re VEBA checks

Date: Tue Jan 29, 08

Time: 0.25

Activity: Correspondence with Thompson

Date: Thu Jan 31, 08

Time: 4.00

Activity: Telephone conference with Teas; telephone conference with Burchfield; telephone conference with Nickelhoff; telephone conference with Nicholson; review damage decision; review East Moline data bases; set up retiree meeting for East Moline

Date: Fri Feb 1, 08

Time: 7.00

Activity: Telephone conference with Hecker; draft letter to East Moline retirees; prepare and oversee mailings to East Moline retirees

Date: Tue Feb 5, 08

Time: 0.50

Activity: Review proposed judgment; telephone conference with Dick Sanders; email to Kennedy re VEBA checks

Date: Wed Feb 6, 08

Time: 0.50

Activity: Telephone conference with Sanders; telephone conference with Mrs. Carroll

Date: Thu Feb 7, 08

Time: 2.00

Activity: Attend meeting with Quad City retirees in Davenport

Date: Mon Feb 11, 08

Time: 1.25

Activity: Telephone conference with Setty; telephone conference with Hitt; telephone conference with Valko; telephone conference with Joe Sabol; review class list

Date: Tue Feb 12, 08

Time: 0.75

Activity: Organize files; review documents and deposition transcripts

Date: Thu Feb 14, 08

Time: 0.50

Activity: Telephone conference with Charles Goodyear; telephone conference with Claudia Hood

Date: Fri Feb 15, 08

Time: 0.75

Activity: Telephone conference with Edith Baxter; telephone conference with Nickelhoff; correspondence with Kennedy

Date: Mon Feb 25, 08

Time: 0.50

Activity: Telephone conference with Fred Mock (2)

Date: Tue Feb 26, 08

Time: 0.25

Activity: Telephone conference with Mr. Marshall

Date: Thu Feb 28, 08

Time: 0.50

Activity: Draft Yolton durable power of attorney

Date: Fri Feb 29, 08

Time: 0.25

Activity: Telephone conference with Nickelhoff and Runyan

Date: Tue Mar 4, 08

Time: 2.00

Activity: Telephone conference with Sanders; email to Sanders; telephone conference with Nancy Henry re Yolton; review and revise Durable Power of Attorney; correspondence with Henry; telephone conference with Vernell Dunn; telephone conference with Valko

Date: Thu Mar 6, 08

Time: 1.00

Activity: Telephone conference with Setty; telephone conference with Sanders; telephone conference with Mrs. Yolton's daughter re POA; revise POA; review Judge Duggan's order re discovery

Date: Fri Mar 7, 08

Time: 2.50

Activity: Review decisions; several email to Saggau, Setty, Anderson, Gaeto, Valko, etc.; telephone conference with Setty; telephone conference with Teas, Montgomery, Halsted and Betker; telephone conference with Rita Peterson, reporter; telephone conference with WVIK reporter; review emails from Saggau, Nicholson and Sherrick

Date: Fri Mar 7, 08

Time: 2.50

Activity: Review decisions; several emails to Saggau, Setty, Anderson, Gaeto, Valko, etc.; telephone conference with Setty; telephone conference with Teas, Montgomery, Halsted and Betker; telephone conference with Rita Peterson, reporter; telephone conference with W-VIK reporter; review emails from Saggau, Nicholson and Sherrick

Date: Sat Mar 8, 08

Time: 1.00

Activity: Organize file

Date: Tue Mar 11, 08

Time: 0.75

Activity: Correspondence with Gladys Yolton and Edward Maynard

Date: Wed Mar 12, 08

Time: 0.25

Activity: Telephone conference with Mrs. Klavenga

Date: Thu Mar 13, 08

Time: 1.25

Activity: Telephone conference with Bill Jones; telephone conference with Fred Mock; telephone conference with Gary Halsted; email to D.L. Kennedy re VEBA disbursement for Pustian; telephone conference with Forrest

Date: Fri Mar 14, 08

Time: 0.25

Activity: Telephone conference with Bob Betker

Date: Mon Mar 17, 08

Time: 0.25

Activity: Telephone conference with Arthur Fleks, Terre Haute newspaper; review Rose v. Volvo decisions

Date: Wed Mar 19, 08

Time: 1.75

Activity: Telephone conference with Smothers' daughter; draft proposed damage claim procedure

Date: Wed Mar 19, 08

Time: 0.50

Activity: Research; review *Noe v. PolyOne* decision

Date: Thu Mar 20, 08

Time: 0.50

Activity: Revise settlement term sheet; email to Saggau

Date: Mon Mar 24, 08

Time: 5.25

Activity: Telephone conference with Kienbaum; telephone conference with Beverly Johnson; review Saggau email; email to Saggau re settlement proposal; email to Saggau re damage procedure; revise proposed damage procedure; conference with Sam re motions for reconsideration and settlement strategy

Date: Tue Mar 25, 08

Time: 0.50

Activity: Telephone conference with Lucy Peterson; review and record class member deaths

Date: Thu Mar 27, 08

Time: 0.50

Activity: Telephone conference with John Valko re Medicare Part B reimbursement; review file re Medicare Part B reimbursement issue

Date: Fri Mar 28, 08

Time: 0.50

Activity: Telephone conference with Hecker; telephone conference with Hitt

Date: Tue Apr 1, 08

Time: 0.75

Activity: Draft, review and revise damage claim procedure; email to Forrest and Rogaczewski

Date: Thu Apr 3, 08

Time: 0.50

Activity: Telephone conference with Elsie Teas; review and input address changes; email to D. Kennedy re VEBA checks

Date: Tue Apr 8, 08

Time: 0.50

Activity: Telephone conference with Saavedra; review notice re response to motions for reconsiderations

Date: Wed Apr 9, 08

Time: 0.50

Activity: Telephone conference with Wilbur Montgomery; telephone conference with Forrest

Date: Mon Apr 14, 08

Time: 1.75

Activity: Review Order granting summary judgment and order denying CNH's motion for summary judgment; review Seymour email; revise class list

Date: Tue Apr 15, 08

Time: 6.00

Activity: Prepare for and attend conference with Kienbaum and Forrest re damage procedure; organize file; review depositions re scanning and storage; telephone conference with Saggau; review litigation costs; draft memo to bookkeeper

Date: Wed Apr 16, 08

Time: 5.50

Activity: Review Duggan's order denying CNH's motion for summary judgment; review CNH motion for clarification; review Plaintiffs' pleadings re CNH's motion for summary judgment; research law on sua sponte summary judgment; research accord and satisfaction

Date: Thu Apr 17, 08

Time: 9.00

Activity: Review Kennedy email; email to Kennedy; research and draft response to CNH motion for clarification

Date: Fri Apr 18, 08

Time: 8.50

Activity: Telephone conference with Bill Jones; research, draft and revise response to motion for clarification

Date: Mon Apr 21, 08

Time: 6.25

Activity: Review motion for clarification; review court order re motion for administrative changes; research and draft response to motion

Date: Tue Apr 22, 08

Time: 5.25

Activity: Research, draft and revise response to motion for clarification

Date: Wed Apr 23, 08

Time: 8.25

Activity: Telephone conference with Forrest; research, draft and revise response to El Paso motion for clarification (4 hours); draft, review and revise response to CNH motion for clarification (2 hours); research re location of retirees who did not cash VEBA checks

Date: Thu Apr 24, 08

Time: 6.50

Activity: Telephone conference with Nona Owens; telephone conference with LaDona Plummer; telephone conference with Dale Peterson; Telephone conference with Mary Taylor; Telephone conference with Thomas Walters re Audrey Schroer; telephone conference with James Pietrowski; research death index and internet re missing class members; email to Kennedy; telephone conference with Donna Richards; organize deposition files

Date: Mon Apr 28, 08

Time: 2.50

Activity: Telephone conference with Evelyn Cudmore; review personnel records; review files re terminated participants; correspondence with Forrest re Cudmore

Date: Tue Apr 29, 08

Time: 2.25

Activity: Draft, review and revise letter to Forrest re Cudmore; email to Forrest; email to Michele Hallee; Draft, review email from Kennedy; review Forrest email

Date: Wed Apr 30, 08

Time: 0.75

Activity: Telephone conference with Carol Kueheman re Ellen Spodick; review email from Hallee re Cudmore; email to Hallee

Date: Thu May 1, 08

Time: 2.50

Activity: Email to Kennedy re VEBA checks (2); create queries by plant for retirees with uncashed checks; email to Sherry Horton at Local 180; review Hallee email re Cudmore; telephone conference with Ms. Cudmore; email to Sanders; email to Seymour; telephone conference with Colorado State Veterans Home re Herman

Date: Mon May 5, 08

Time: 0.75

Activity: Telephone conference with John Setty; telephone conference with surviving spouse; email Anderson re Burlington retirees

Date: Tue May 6, 08

Time: 3.00

Activity: Review order denying El Paso motion for clarification; review order granting CNH motion for reconsideration; review and revise settlement term sheet; correspondence with Forrest re settlement; correspondence with Forrest re Cudmore eligibility; correspondence with Forrest re release of premiums held as bond

Date: Wed May 7, 08

Time: 0.75

Activity: Telephone conference with Bill Jones; telephone conference with Forrest; telephone conference with Tom Seymour

Date: Thu May 8, 08

Time: 1.75

Activity: Review pleadings; draft stipulated order re premiums held as bond; correspondence with Forrest

Date: Mon May 12, 08

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue May 13, 08

Time: 0.25

Activity: Telephone conference with Fred Mrok

Date: Wed May 14, 08

Time: 0.25

Activity: Telephone conference with Cudmore

Date: Mon May 19, 08

Time: 1.25

Activity: Review Local 180 census data changes; email to Kennedy; telephone conference with Hitt; review Forrest email re Cudmore; email Forrest; review Kennedy email; email Kennedy; telephone conference with Setty

Date: Wed May 21, 08

Time: 0.75

Activity: Review class member data re addresses and deaths; email to Kennedy re VEBA checks

Date: Tue May 27, 08

Time: 0.25

Activity: Telephone conference with Forrest; review El Paso list of bond deposits; review personnel records re retirees with deposits; research death index; telephone conference with Richard Couillard re claims problem

Date: Mon Jun 9, 08

Time: 0.50

Activity: Telephone conference with Teas; telephone conference with Seymour

Date: Tue Jun 10, 08

Time: 0.50

Activity: Telephone conference with Montgomery; telephone conference with Mr. Galbreath re Gentry; telephone conference with Anderson; telephone conference with Chambers re VEBA check

Date: Fri Jun 13, 08

Time: 0.25

Activity: Telephone conference with Mr. Lavine

Date: Wed Jun 18, 08

Time: 0.25

Activity: Telephone conference with Fred Mock

Date: Fri Jun 20, 08

Time: 3.00

Activity: Review and revised El Paso's stipulated order re return of escrowed funds; review and revise damage claim procedure; email Forrest re damage claim procedure and return of escrowed funds; telephone conference with Forrest

Date: Mon Jun 23, 08

Time: 1.50

Activity: Telephone conference with Forrest; revise claims procedure; email Forrest

Date: Tue Jun 24, 08

Time: 0.25

Activity: Email Yolton decisions to Westlaw for publication

Date: Wed Jun 25, 08

Time: 0.25

Activity: Review deceased class member data; modify class list

Date: Thu Jun 26, 08

Time: 0.50

Activity: Telephone conference with Ron Hitt; review Seymour email; enter info in class data base

Date: Fri Jun 27, 08

Time: 0.25

Activity: Telephone conference with Jerry Moorehouse

Date: Tue Jul 1, 08

Time: 0.25

Activity: Telephone conference with Sanders

Date: Wed Jul 2, 08

Time: 0.25

Activity: Telephone conference with Setty

Date: Mon Jul 7, 08

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue Jul 8, 08

Time: 0.75

Activity: Correspondence with Marshfield Clinic

Date: Fri Jul 11, 08

Time: 1.25

Activity: Telephone conference with Bill Jones; telephone conference with Anderson; telephone conference with Fred Mock; correspondence with Cardinal Health System; correspondence with Forrest

Date: Thu Jul 17, 08

Time: 0.25

Activity: Review Forrest emails re escrowed funds and damage claims issues

Date: Fri Jul 18, 08

Time: 1.50

Activity: Review Forrest letter; create list of Class Members with escrowed funds; correspondence with Forrest re escrowed funds

Date: Mon Jul 21, 08

Time: 2.50

Activity: Telephone conference with Berniece Holding; telephone conference with Jim Marshall; review list of escrow refunds

Date: Tue Jul 22, 08

Time: 5.75

Activity: Prepare for and attend conference with Meisgeier, Malone, Kienbaum, Forrest and McKnight re settlement; telephone conference with Saggau; review escrow list; correspondence with Forrest

Date: Wed Jul 23, 08

Time: 1.00

Activity: Review data base and documents re class members eligible for bond refund; revise correspondence to Forrest re bond refund

Date: Mon Jul 28, 08

Time: 0.50

Activity: Telephone conference with Janezic (Segal); conference call with Meisgeier, Kienbaum and Forrest

Date: Fri Aug 1, 08

Time: 0.75

Activity: Review Forrest letter re bond refunds; search files and internet re deceased; revise List of eligible bond refunds

Date: Sat Aug 2, 08

Time: 0.50

Activity: Correspondence with Forrest re escrow list

Date: Mon Aug 11, 08

Time: 0.50

Activity: Telephone conference with Elsie Teas; telephone conference with Hecker

Date: Mon Aug 18, 08

Time: 0.75

Activity: Telephone conference with Sharon Miller; review emails from Forrest and Levine; email to Levine; correspondence with Forrest re Miller

Date: Tue Aug 19, 08

Time: 0.25

Activity: Telephone conference with Anderson

Date: Wed Aug 20, 08

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Mon Aug 25, 08

Time: 0.75

Activity: Telephone conference with Jim Marshall; correspondence with Forrest; review and revise Exhibit A to stipulated Order

Date: Tue Aug 26, 08

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Wed Aug 27, 08

Time: 1.50

Activity: Revise damage claim procedure; review Kienbaum letter and El Paso proposal

Date: Thu Aug 28, 08

Time: 0.75

Activity: Correspondence with Forrest; review and revise claims procedure

Date: Tue Sep 2, 08

Time: 0.50

Activity: Telephone conference with Mrs. Henry Bester; telephone conference with John Valco

Date: Wed Sep 3, 08

Time: 0.50

Activity: Telephone conference with Mary Stone; review CNH complaint against UAW

Date: Thu Sep 4, 08

Time: 1.00

Activity: Telephone conference with Forrest (2) re escrow; telephone conference with Paula Randolph

Date: Mon Sep 8, 08

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Thu Sep 11, 08

Time: 0.25

Activity: Correspondence with Forrest

Date: Mon Sep 15, 08

Time: 0.25

Activity: telephone conference with Bill Jones

Date: Tue Sep 16, 08

Time: 0.75

Activity: Telephone conference with Andy Anderson; telephone conference with Jane Patten; email to Michele Hallee

Date: Wed Sep 17, 08

Time: 0.25

Activity: Correspondence with Forrest

Date: Mon Sep 22, 08

Time: 0.25

Activity: Telephone conference with Alliance Collections

Date: Thu Sep 25, 08

Time: 1.75

Activity: Telephone conference with Burchfield; attend status conference

Date: Mon Sep 29, 08

Time: 0.25

Activity: Telephone conference with Sanders

Date: Tue Sep 30, 08

Time: 0.25

Activity: Telephone conference with Bill Jones; telephone conference with Michele O'Neill

Date: Wed Oct 1, 08

Time: 0.25

Activity: Telephone conference with Anderson

Date: Thu Oct 2, 08

Time: 10.00

Activity: Travel to Indianapolis; attend retiree meeting

Date: Sat Oct 4, 08

Time: 2.25

Activity: Draft notice of opportunity to file damage claim; correspondence with Forrest

Date: Tue Oct 7, 08

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Wed Oct 8, 08

Time: 0.75

Activity: Review Forrest email; email Forrest; correspondence with Forrest; calculate interest on escrowed funds

Date: Thu Oct 9, 08

Time: 0.25

Activity: Telephone conference with Montgomery

Date: Tue Oct 21, 08

Time: 0.25

Activity: Email to Forrest

Date: Wed Oct 22, 08

Time: 0.25

Activity: Email to Local 807

Date: Fri Oct 24, 08

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Tue Oct 28, 08

Time: 1.50

Activity: Correspondence with Kennedy re VEBA checks; review documents and enter data in database; telephone conference with Lorice Thompson; review CNH proposed stipulations; review order rejecting accord and satisfaction defense

Date: Thu Oct 30, 08

Time: 3.75

Activity: Telephone conference with Andy Anderson; review CNH proposed stipulations; review documents re 1998 negotiations and VEBA; draft proposed stipulations

Date: Fri Oct 31, 08

Time: 6.25

Activity: Review CNH Proposed Stipulations; draft proposed stipulations; telephone conference with Linda Lash (3); telephone conference with Dennis Williams; telephone conference with John Setty; telephone conference with Billy Cox; telephone conference with Tom Seymour; review documents re 1998 negotiations; review UAW constitution; review correspondence from Tom Waugh; review documents database; review class lists and update data base

Date: Sat Nov 1, 08

Time: 6.75

Activity: Draft and revise stipulations; review documents; revise data base; review Waugh letter re pension

Date: Mon Nov 3, 08

Time: 1.25

Activity: Email to Penny Clark (2); review Clark email; review reply brief in CNH lawsuit against UAW; telephone conference with Tom Seymour

Date: Tue Nov 4, 08

Time: 0.25

Activity: Email to Forrest re escrow checks

Date: Wed Nov 5, 08

Time: 1.25

Activity: Correspondence with Kienbaum; telephone conference with Anderson; review class data base and documents re class members

Date: Thu Nov 6, 08

Time: 1.00

Activity: Telephone conference with Anderson; telephone conference with Setty; review minutes of retiree meetings; review Burchfield correspondence (2)

Date: Fri Nov 7, 08

Time: 0.50

Activity: Telephone conference with Anderson

Date: Tue Nov 11, 08

Time: 0.25

Activity: Telephone conference with Rogaczewski

Date: Wed Nov 12, 08

Time: 2.75

Activity: Review proposed stipulations; research re consent; correspondence with Ms. Garcia; telephone conference with Robert Gaunt re Yeggy; telephone conference with Mike Nicholson; review file re subpoena; email to Nicholson

Date: Thu Nov 13, 08

Time: 4.75

Activity: Telephone conference with Nicholson(3); review stipulations of fact; review Burchfield's letter re UAW subpoena; research re CNH's demand to supplement production; review UAW production; review class lists re deaths; correspondence with Forrest re class lists

Date: Fri Nov 14, 08

Time: 5.75

Activity: Telephone conference with Halsted; Telephone conference with Maynard; Telephone conference with Teas; telephone conference with Sanders; review and revise stipulations of fact; correspondence with Rogaczewski; correspondence with Burchfield; research re supplemental discovery responses; telephone conference with Penny Clark; telephone conference with Seymour(2)

Date: Mon Nov 17, 08

Time: 1.00

Activity: Telephone conference with Bill Jones; telephone conference with Nicholson; telephone conference with Valko; telephone conference with attorney for Mrs. Maesch

Date: Tue Nov 18, 08

Time: 6.75

Activity: Telephone conference with Kathy Belzer re Maryann McKinney; research and draft motion in limine

Date: Wed Nov 19, 08

Time: 6.25

Activity: Organize file re trial; telephone conference with Michael Nicholson; telephone conference with Rogaczewski; review documents re accord and satisfaction; research and draft motion in limine

Date: Thu Nov 20, 08

Time: 8.50

Activity: Telephone conference with Geraldine Klavenga; telephone conference with Nicholson; review subpoenas; telephone conference with Dick Sanders; research and draft motion in limine

Date: Fri Nov 21, 08

Time: 9.50

Activity: Research and draft motion in limine; review CNH's subpoenas; review documents; telephone conference with Nicholson (3); review Burchfield letter to Nicholson; email Nicholson; review database re local union publications

Date: Mon Nov 24, 08

Time: 0.75

Activity: Telephone conference with John Setty; telephone conference with Ron Hitt; telephone conference with Forrest; prepare address list for escrow checks

Date: Tue Nov 25, 08

Time: 2.50

Activity: Telephone conference with Josh Rogaczewski (2); telephone conference with Andy Anderson; telephone conference with Barbara Butts re Mildred Laue; telephone conference with Jerry Moorehouse; research re order of proof for affirmative defenses; prepare address labels; correspondence with retirees re escrow check; oversee mailing of checks

Date: Wed Nov 26, 08

Time: 5.25

Activity: Telephone conference with Forrest; oversee mailing of escrow checks; draft letters for escrow checks (several); telephone conference with Nicholson re subpoenas; review stipulated order; email to Rogaczewski; telephone conference with Rogaczewski; correspondence with Burchfield re discovery; review deposition transcripts and documents re proposed exhibit list

Date: Fri Nov 28, 08

Time: 10.00

Activity: Telephone conference with Sherry Harmon; telephone conference with Betty Boyles; telephone conference with Mrs. Lozano; telephone conference with Bobbie Smith-Garth; review and summarize documents; draft exhibit list; prepare deposition excerpts; trial preparation

Date: Mon Dec 1, 08

Time: 9.00

Activity: Telephone conference with James Marshall; telephone conference with Annie Howell; telephone conference with Laura Hoegsted; telephone conference with Casteel; telephone conference with Rogaczewski; review Burchfield correspondence; review documents and depositions; telephone conference with Harmon; email to Nicholson; draft witness and exhibit list

Date: Tue Dec 2, 08

Time: 1.00

Activity: Telephone conference with Rogaczewski (twice); prepare exhibit list; correspondence with Rogaczewski

Date: Wed Dec 3, 08

Time: 4.00

Activity: Telephone conference with Exline; correspondence with Forrest re escrow checks of deceased class members; email to Valko re escrow checks and case status; telephone conference with Nicholson; review documents; email to Nicholson

Date: Thu Dec 4, 08

Time: 4.25

Activity: Telephone conference with Mrs. Moreno; telephone conference with Mrs. Sliger; telephone conference with Mrs. Archey; review documents re UAW communications; email to Nicholson (two); telephone conference with re subpoenas, review subpoenas and past subpoenas

Date: Fri Dec 5, 08

Time: 3.75

Activity: Telephone conference with John Setty; telephone conference with Marilyn Acklam; telephone conference with Robert Wells; telephone conference with Mrs. Ahrens; telephone conference with Barbara Schmidt re Margaret Lessnau; telephone conference with Bill Jones; search for addresses of class members whose checks were returned; telephone conference with Helen Heiland; telephone conference with Nicholson re UAW subpoenas

Date: Sat Dec 6, 08

Time: 0.50

Activity: Review motion for summary judgment, supporting declarations

Date: Mon Dec 8, 08

Time: 5.25

Activity: Telephone conference with Bill Jones re subpoena; telephone conference with Mark Parr re subpoena; telephone conference with Andy Anderson; telephone conference with Billy Cox; review Levine letter re subpoenas; telephone conference with Mrs. Sliger; telephone conference with Mike Bridges re remarried spouses; telephone conference with Jeff Vash; telephone conference call with Penny Clark and Mike Saggau; telephone conference with Elsie Teas; telephone conference with Jim Clifford; telephone conference with Jim Muncie; telephone conference with Melvin Sann; telephone conference with Will Forrest; review Atwood deposition transcript; search for class members with returned checks; review Shanks correspondence

Date: Tue Dec 9, 08

Time: 3.25

Activity: Telephone conference with Willie Curtis; telephone conference with Jack Capps; email Hecker re status of litigation; telephone conference with Helen Heiland; research motion for protective order; draft reply brief in support of motion in limine; telephone conference with Nicholson

Date: Thu Dec 11, 08

Time: 8.75

Activity: Telephone conference with Nicholson re subpoena; telephone conference with Kale re subpoena; correspondence with Levine; research and draft reply in support of motion in limine: Telephone conference with Gennie Bemis; review email for Johnson re Penrod; review file re Penrod

Date: Fri Dec 12, 08

Time: 7.25

Activity: Telephone conference with Billy Cox; research and draft reply brief; review Levine correspondence; telephone conference with Kathleen Thorndike

Date: Sun Dec 14, 08

Time: 7.75

Activity: Research, draft and revise reply brief in support of motion in limine

Date: Mon Dec 15, 08

Time: 10.25

Activity: Telephone conference with Forrest ; research, draft and revise motion for protective order and stay; review exhibits and draft response to CNH witness and exhibit list; correspondence with Rogaczewski; telephone conference with Mrs. Mason

Date: Tue Dec 16, 08

Time: 7.25

Activity: Telephone conference with Jack Reese; telephone conference with Rogaczewski (two); research, draft and revise reply; telephone conference with Anna Kling; telephone conference with Dick Sanders

Date: Wed Dec 17, 08

Time: 8.25

Activity: Telephone conference with Bill Jones; telephone conference with Jim Reynolds; telephone conference with Tom Kale (two); telephone conference with Mike Nicholson; correspondence with Levine; review Levine correspondence; review and revise reply brief in support of motion in limine; telephone conference with Carl Chmielewski; telephone conference with Al Hartog; telephone conference with Dennis Tesolowski; review retiree deaths; revise database

Date: Thu Dec 18, 08

Time: 1.75

Activity: Telephone conference with Reynolds; telephone conference with Prine; telephone conference with Nicholson; correspondence with Levine; conference with Marilyn Orem re trial; telephone conference with Barbara Freeman

Date: Fri Dec 19, 08

Time: 4.25

Activity: Telephone conference with Nicholson (two); telephone conference with Sanders (two); email Levine; review Levine correspondence; correspondence with Levine; review surreply brief; telephone conference with William Jones; correspondence with Forrest; telephone conference with Sherry Harmon

Date: Mon Dec 22, 08

Time: 7.25

Activity: Telephone conference with Dick Sanders (two); telephone conference with Nicholson (two); research and draft response to surreply brief; correspondence with Levine re motion for protective order; review Levine email

Date: Tue Dec 23, 08

Time: 1.25

Activity: Email to Levine; review Levine email; telephone conference with Rogaczewski; draft motion to withdraw

Date: Wed Dec 24, 08

Time: 1.50

Activity: Conference with Nicholson; review documents

Date: Fri Dec 26, 08

Time: 4.00

Activity: Brief witness Atwood depositions; prepare response to witness/exhibit lists

Date: Sun Dec 28, 08

Time: 7.50

Activity: Review depositions and draft second witness list

Date: Mon Dec 29, 08

Time: 0.25

Activity: Telephone conference with Dean Prine; telephone conference with Steve Eichlestein

Date: Wed Dec 31, 08

Time: 0.50

Activity: Telephone conference with Rogaczewski(2)

Date: Fri Jan 2, 09

Time: 1.00

Activity: Telephone conference with Bill Jones; telephone conference with Reynolds; telephone conference with Mike Nicholson; telephone conference with Sandra Nussear re Martha Lambert

Date: Mon Jan 5, 09

Time: 1.00

Activity: Telephone conference with Nicholson and Saggau; telephone conference with Andy Anderson; review Levine correspondence; telephone conference with Don Stewart

Date: Wed Jan 7, 09

Time: 10.75

Activity: Telephone conference with Kale (2); draft final pretrial order; review Duggan's order re motion in limine; trial preparation; telephone conference with Saggau; review and produce summary re VEBA documents

Date: Thu Jan 8, 09

Time: 5.25

Activity: Telephone conference with John Dexter; telephone conference with Levine (2); telephone conference with Nicholson; telephone conference with Kale (2); draft and revise joint pretrial order; telephone conference with Rogaczewski; email Rogaczewski; trial preparation; prepare trial exhibits; review Defendants' exhibits

Date: Fri Jan 9, 09

Time: 2.50

Activity: Telephone conference with Rogaczewski(2); review Levine correspondence; review documents; trial preparation; telephone conference with Anderson

Date: Sat Jan 10, 09

Time: 0.50

Activity: Review document and transcript binders

Date: Sun Jan 11, 09

Time: 1.25

Activity: Trial preparation

Date: Mon Jan 12, 09

Time: 2.25

Activity: Correspondence with Levine; trial preparation; telephone conference with Reynolds; telephone conference with Setty; telephone conference with Prine; conference with Atwood; conference with Shoemaker

Date: Tue Jan 13, 09

Time: 10.25

Activity: Telephone conference with Elsie Teas; telephone conference with Reynolds; telephone conference with Kales; draft response to motion in limine; prepare for and attend final pretrial conference; prepare for Kale deposition; email to Ankers; review documents; telephone conference with Saggau

Date: Wed Jan 14, 09

Time: 15.00

Activity: Prepare for Kale deposition; travel to Phoenix; conference with Kale

Date: Thu Jan 15, 09

Time: 16.00

Activity: Prepare for and attend Kale deposition; travel to Tampa

Date: Fri Jan 16, 09

Time: 10.50

Activity: Trial preparation; travel to Ocala; meet with Reynolds

Date: Sat Jan 17, 09

Time: 5.75

Activity: Travel from Tampa

Date: Sun Jan 18, 09

Time: 8.25

Activity: Trial preparation; prepare for Haas cross examination; review 1998 negotiations; draft negotiations timeline

Date: Mon Jan 19, 09

Time: 0.25

Activity: Telephone conference with Bill Jones; telephone conference with John Setty; trial preparation; prepare Haas cross; review Plaintiffs' exhibits; draft trial brief

Date: Tue Jan 20, 09

Time: 10.50

Activity: Trial preparation; review documents; Haas cross examination; opening statement

Date: Wed Jan 21, 09

Time: 10.50

Activity: Telephone conference with Prine; telephone conference with Reynolds; telephone conference with Ron Hitt; trial preparation; revise opening; draft and revise Haas cross

Date: Thu Jan 22, 09

Time: 9.75

Activity: prepare for trial; travel to Detroit; telephone conference with Prine; review Prine documents; prepare cross of Reynolds, Prine and Shoemaker; correspondence with Forrest; review and revise notice of opportunity; review returned escrow checks; review Sherry Horton email re deceased class members; update class member data base

Date: Fri Jan 23, 09

Time: 8.25

Activity: Draft and Revise Notice of Opportunity to File Damage Claims; correspondence with Forrest; review Forrest email; email Forrest; telephone conference with Michele Robinson re claim; Trial preparation; Shoemaker cross; review depositions; correspondence with Burchfield; telephone conference with Shoemaker; telephone conference with Prine; telephone conference with Reynolds

Date: Sat Jan 24, 09

Time: 8.00

Activity: Trial preparation; review documents; draft Prine chronology; telephone conference with Prine; telephone conference with Reynolds; review Defendants' exhibits re objections

Date: Sun Jan 25, 09

Time: 7.00

Activity: Review Forrest correspondence re damages and escrow funds; correspondence with Forrest (2); revise opening; draft objections; research re common law agency; correspondence with Rogaczewski re exhibits; telephone conference with Shoemaker and Saggau; trial preparation

Date: Mon Jan 26, 09

Time: 8.75

Activity: Trial preparation; telephone conference with Prine; telephone conference with Reynolds; draft and revise opening statement; cross of Haas; review Levine letter; correspondence with Levine; review Rogaczewski email; draft proposed order for deposit of security bond

Date: Tue Jan 27, 09

Time: 15.00

Activity: Attend trial; trial preparation

Date: Wed Jan 28, 09

Time: 12.50

Activity: Attend trial; trial preparation

Date: Thu Jan 29, 09

Time: 11.50

Activity: Trial preparation; attend trial

Date: Fri Jan 30, 09

Time: 1.00

Activity: Telephone conference with Rogaczewski; telephone conference with Saggau; telephone conference with Prine; telephone conference with Betty Zastrow

Date: Sat Jan 31, 09

Time: 2.75

Activity: Organize trial exhibits and file; correspondence with Levine; correspondence with Mrs. Comstock re refund; review retiree death information; revise database

Date: Sun Feb 1, 09

Time: 0.50

Activity: Organize file; review depositions for filing

Date: Mon Feb 2, 09

Time: 2.75

Activity: Telephone conference with John Setty; telephone conference with Sanders; correspondence with Ray Rogers; correspondence with Ralph Gaeto; correspondence with Ron Pauley; email Seymour; email to Dick Sanders; draft proposed findings of fact

Date: Tue Feb 3, 09

Time: 0.75

Activity: Telephone conference with Nicholson; review Horton email re Class Member deaths; review emails re new addresses for Class Members; resend checks

Date: Wed Feb 4, 09

Time: 0.25

Activity: Telephone conference with Saggau

Date: Thu Feb 5, 09

Time: 1.50

Activity: Confer with Michele Robinson re damage issues; telephone conference with Will Forrest re damages; telephone conference with Rogaczewski

Date: Fri Feb 6, 09

Time: 1.00

Activity: Telephone conference with Halsted; review Kale deposition; correspondence with Rogaczewski

Date: Sun Feb 8, 09

Time: 1.00

Activity: Draft findings of fact and conclusions of law

Date: Mon Feb 9, 09

Time: 1.00

Activity: Telephone conference with Kathy Chambers; email Chambers; telephone conference with Elsie Teas; telephone conference with Walt Whipple; review Sanders email

Date: Tue Feb 10, 09

Time: 2.5

Activity: Organize file; correspondence with Marilyn Orem; review admitted exhibits; draft admitted exhibit list; telephone conference with Bill Jones; correspondence with Forrest; telephone conference with Anderson; Telephone conference with Mrs. Hook; email to John Setty

Date: Wed Feb 11, 09

Time: 2.25

Activity: Telephone conference with Felicia Thomasino; review class lists; search re retiree deaths

Date: Thu Feb 12, 09

Time: 0.25

Activity: Review Forrest email; email to Forrest

Date: Fri Feb 13, 09

Time: 1.25

Activity: Correspondence with Karen Stewart; review class lists; correspondence with Forrest re class lists

Date: Sun Feb 15, 09

Time: 0.25

Activity: Correspondence with Forrest

Date: Mon Feb 16, 09

Time: 3.00

Activity: Draft proposed findings of fact and conclusions of law; telephone conference with Setty

Date: Tue Feb 17, 09

Time: 0.75

Activity: Telephone conference with Forrest; email to Hecker; telephone conference with Rogaczewski

Date: Fri Feb 20, 09

Time: 1.0

Activity: Review UAW's motion to dismiss; telephone conference with Penny Clark; draft stipulation re extension to file proposed findings of fact; email to Rogaczewski

Date: Fri Feb 27, 09

Time: 1.00

Activity: Telephone conference with Moses re bond; telephone conference with Sanders; telephone conference with Jim Marshall; review class death information; telephone conference with Ron Hitt; telephone conference with John Rotkis

Date: Mon Mar 2, 09

Time: 0.25

Activity: Telephone conference with Sanders

Date: Wed Mar 4, 09

Time: 2.50

Activity: Telephone conference with Forrest; review revised notice; review draft claim form; review data base re deceased retirees; telephone conference with CBE Group re Cotrell/United Health; telephone conference with Alliance Collection Agency; draft, review and revise findings of fact

Date: Thu Mar 5, 09

Time: 9.5

Activity: Telephone conference with Hitt; review transcript; draft and revise proposed findings of fact and conclusions of law

Date: Fri Mar 6, 09

Time: 6.50

Activity: Review trial transcript; draft proposed findings of fact and conclusions of law

Date: Sat Mar 7, 09

Time: 7.00

Activity: Draft, review and revise proposed findings of fact and conclusions of law

Date: Sun Mar 8, 09

Time: 6.00

Activity: Draft, review and revise findings of fact and conclusions of law

Date: Mon Mar 9, 09

Time: 0.25

Activity: Telephone conference with Elsie Teas; draft and finalize proposed Findings of Fact and Conclusions of Law

Date: Tue Mar 10, 09

Time: 2.00

Activity: Telephone conference with Bill Jones; telephone conference with Chambers; review list of uncashed checks; email Kennedy; telephone conference with Carl Chmielewski; review and revise notice of filing depositions

Date: Wed Mar 11, 09

Time: 0.25

Activity: Telephone conference with Paul Newberry

Date: Thu Mar 12, 09

Time: 1.00

Activity: Telephone conference with Mrs. Zastrow; telephone conference with John Setty; telephone conference with Will Forrest

Date: Mon Mar 16, 09

Time: 6.00

Activity: Review documents re escrow reimbursement; review class lists re eligibility; review Forrest email; email to Forrest; review correspondence; correspondence with Tyykila re escrow reimbursement; organize file; email Michele Robinson re damage program; telephone conference with Judith Miller; review class lists

Date: Tue Mar 17, 09

Time: 5.75

Activity: Review Class Lists; correspondence with Forrest; search data base re pension documents

Date: Tue Mar 24, 09

Time: 0.25

Activity: Telephone conference with Walt Whipple

Date: Thu Mar 26, 09

Time: 1.25

Activity: Telephone conference with John Setty; prepare for conference call; telephone conference with Dan Sanford; correspondence with Tyykila; correspondence with Forrest

Date: Fri Mar 27, 09

Time: 0.75

Activity: Telephone conference with Forrest and Meisgeier

Date: Mon Mar 30, 09

Time: 1.00

Activity: Review settlement offer; telephone conference with Forrest and Meisgeier

Date: Thu Apr 2, 09

Time: 0.25

Activity: Email to Kathy Chambers; telephone conference with Chad Ziegler; telephone conference with Burbette Lavine

Date: Fri Apr 3, 09

Time: 0.25

Activity: Telephone conference with Laura Hoegsted

Date: Mon Apr 6, 09

Time: 0.25

Activity: Telephone conference with Maureen Eisenman

Date: Tue Apr 7, 09

Time: 1.75

Activity: Telephone conference with Will Forrest; telephone conference with Donna May re Cottrell; review list of retirees with uncashed VEBA checks; telephone conference with Michele Robinson

Date: Wed Apr 8, 09

Time: 0.50

Activity: Telephone conference with Jim Hecker; telephone conference with Ray Garcia; telephone conference with Donna May re Cottrell

Date: Thu Apr 9, 09

Time: 1.00

Activity: Correspondence with Levine; work with Robinson on claim form

Date: Mon Apr 13, 09

Time: 0.50

Activity: Telephone conference with Elsie Teas; telephone conference with Jeff Vasch

Date: Tue Apr 14, 09

Time: 0.25

Activity: Telephone conference with John Setty

Date: Thu Apr 16, 09

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Wed Apr 22, 09

Time: 0.25

Activity: Review materials from John Setty's complaint re United HealthCare

Date: Thu Apr 23, 09

Time: 0.25

Activity: Telephone conference with Jeff Vasch

Date: Fri Apr 24, 09

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Mon Apr 27, 09

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Wed Apr 29, 09

Time: 0.25

Activity: Correspondence with Harmon

Date: Mon May 4, 09

Time: 0.75

Activity: Conference with Michele Robinson re damage claim program; telephone conference with Alliance Collection re Cotrell

Date: Tue May 5, 09

Time: 0.50

Activity: Telephone conference with John Setty; telephone conference with Adam, U of Iowa Hospital re Cotrell; telephone conference with Jeff Vasch

Date: Mon May 11, 09

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue May 12, 09

Time: 0.25

Activity: Telephone conference with James Sliger

Date: Thu May 28, 09

Time: 0.25

Activity: Telephone conference with John Vipond

Date: Fri Jun 5, 09

Time: 1.50

Activity: Review Forrest email; email Forrest; review returned escrow check list; telephone conference with Amaya, Mary Cetrano, Mr. McCoy, Mr. Keck and Anton Kerchner

Date: Mon Jun 8, 09

Time: 1.25

Activity: Telephone conference with Veveine Starling; telephone conference with Elsie Teas; telephone conference with Dick Sanders; correspondence with Forrest re Vipond; review Horton email re Racine changes; revise data base; email Horton

Date: Tue Jun 9, 09

Time: 1.25

Activity: Telephone conference with Bill Jones; telephone conference with Mr. O'Neill; telephone conference with Betty Cornell; review list of uncashed escrow checks

Date: Wed Jun 10, 09

Time: 0.25

Activity: Telephone conference with Marjorie Gerber

Date: Thu Jun 11, 09

Time: 1.00

Activity: Telephone conference with Forrest; correspondence with Forrest re uncashed checks

Date: Fri Jun 12, 09

Time: 0.50

Activity: Telephone conference with Marjorie Gerber; review recent class lists

Date: Mon Jun 15, 09

Time: 0.25

Activity: Telephone conference with John Setty

Date: Thu Jun 18, 09

Time: 1.75

Activity: Telephone conference with Jeff Vasch; correspondence with Butler re VEBA check; review and revise class lists

Date: Mon Jun 29, 09

Time: 0.25

Activity: Telephone conference with Donald Bowden

Date: Wed Jul 8, 09

Time: 0.50

Activity: Email Valko; correspondence with Bowden; telephone conference with Herb Trix

Date: Fri Jul 10, 09

Time: 1.00

Activity: Telephone conference with Bill Jones; telephone conference with Delores Murray; review class lists

Date: Mon Jul 13, 09

Time: 2.75

Activity: Telephone conference with Elsie Teas; telephone conference with Tom Seymour; review class list; review El Paso changes to claims procedure

Date: Tue Jul 14, 09

Time: 2.50

Activity: Telephone conference with Dick Sanders; review damage claims procedure; correspondence with Class Members re escrow checks; revise class list; email to Sherry Horton

Date: Wed Jul 15, 09

Time: 0.50

Activity: Telephone conference with Forrest

Date: Fri Jul 24, 09

Time: 0.25

Activity: Correspondence with Mrs. Moore re check

Date: Mon Jul 27, 09

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Tue Jul 28, 09

Time: 0.50

Activity: Telephone conference with Nancy Schiffer; email to Atwood and Hecker

Date: Thu Jul 30, 09

Time: 0.25

Activity: Telephone conference with Forrest

Date: Fri Jul 31, 09

Time: 0.50

Activity: Telephone conference with Andy Anderson; telephone conference with John Setty

Date: Wed Aug 5, 09

Time: 0.25

Activity: Telephone conference with Carolyn Bleashka

Date: Fri Aug 7, 09

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Wed Aug 12, 09

Time: 0.25

Activity: Review retiree updates; modify database

Date: Thu Aug 13, 09

Time: 4.25

Activity: Telephone conference with Forrest; revise notice of opportunity to file claims; review and revise class lists

Date: Fri Aug 14, 09

Time: 0.25

Activity: Telephone conference with John Setty

Date: Tue Aug 18, 09

Time: 1.00

Activity: Telephone conference with Jeff Vasch; telephone conference with Sarah Thomas; correspondence with Forrest re Thomas and deceased Class members

Date: Thu Aug 20, 09

Time: 0.50

Activity: Telephone conference with Laura Hoegstad; telephone conference with Will Forrest

Date: Fri Aug 21, 09

Time: 1.00

Activity: Review El Paso's benefit summary; review Forrest email and revised claims procedure; review East Moline deaths and enter data

Date: Mon Aug 24, 09

Time: 7.25

Activity: Telephone conference with Dick Sanders; email to Sanders, Shanks, Valko and Setty; review United HealthCare documents; review El Paso benefit summary; prepare for meeting with El Paso and Blue Cross in Houston; organize files re settlement pleadings

Date: Tue Aug 25, 09

Time: 17.00

Activity: Travel to and from Houston; prepare for discussions; conference with El Paso, Towers Perrin and Blue Cross representatives; conference with Forrest and Meisgeier

Date: Wed Aug 26, 09

Time: 3.25

Activity: Email to Chuck Shanks; draft notices of final damage claim amounts; review damage claim form; review and revise data base

Date: Thu Aug 27, 09

Time: 3.25

Activity: Draft instruction sheets; draft damage claim forms; email to Forrest (2)

Date: Mon Aug 31, 09

Time: 0.25

Activity: Correspondence with attorney Hoveldt re Marion Morton

Date: Tue Sep 1, 09

Time: 1.00

Activity: Correspondence with Charles Swanson re Franklin Payne; review and modify data base

Date: Wed Sep 2, 09

Time: 0.25

Activity: Telephone conference with Bobby Burchfield

Date: Thu Sep 3, 09

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Thu Sep 10, 09

Time: 4.00

Activity: Review Saggau email; review decisions; email to Saggau; review El Paso settlement offer; telephone conference with Saggau; email to Saggau re settlement

Date: Fri Sep 11, 09

Time: 0.25

Activity: Telephone conference with Forrest re settlement

Date: Mon Sep 14, 09

Time: 1.00

Activity: Telephone conference with Mrs. Iverson; telephone conference with Sanders; email to Sanders; telephone conference with John Valko; telephone conference with Jenna re Krzanowski

Date: Tue Sep 15, 09

Time: 0.25

Activity: Telephone conference with Gerald Johnson

Date: Wed Sep 16, 09

Time: 0.25

Activity: Telephone conference with Burdette Levine

Date: Fri Sep 18, 09

Time: 2.75

Activity: Telephone conference with Bill Jones; telephone conference with Will Forrest re documents re El Paso settlement proposal; draft counter proposal

Date: Mon Sep 21, 09

Time: 1.00

Activity: Telephone conference with Paul Vieau; telephone conference with Saggau, Sam and Harrell

Date: Fri Sep 25, 09

Time: 0.25

Activity: Telephone conference with Hitt

Date: Mon Sep 28, 09

Time: 1.50

Activity: Correspondence with Hitt; telephone conference with Forrest; review document in preparation of closing arguments

Date: Tue Sep 29, 09

Time: 4.75

Activity: Research and prepare for closing argument; review trial exhibits

Date: Wed Sep 30, 09

Time: 1.00

Activity: Prepare for oral argument

Date: Mon Oct 5, 09

Time: 7.50

Activity: Telephone conference with Lottie Mackey; preparation for closing argument

Date: Tue Oct 6, 09

Time: 7.75

Activity: Prepare for closing argument

Date: Wed Oct 7, 09

Time: 7.25

Activity: Prepare for and attend closing argument

Date: Thu Oct 8, 09

Time: 1.25

Activity: Telephone conference with Helen Bollinger; email Ms. Duncan (2); email to Michele Hallee re survivor pension; email to Sherry of Local 180 re Nesbitt.

Date: Fri Oct 9, 09

Time: 0.25

Activity: Telephone conference with Michele Hallee

Date: Tue Oct 13, 09

Time: 0.25

Activity: Review supplemental Brief

Date: Wed Oct 14, 09

Time: 0.25

Activity: Telephone conference with Forrest

Date: Mon Oct 19, 09

Time: 0.25

Activity: Telephone conference with Jim Marshall

Date: Tue Oct 20, 09

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Wed Oct 21, 09

Time: 0.50

Activity: Telephone conference with Kevin M, Local 180 benefit rep; review pension plan; email Local 180

Date: Thu Oct 22, 09

Time: 0.75

Activity: Telephone conference with Rosa Hecht; create query re Bettendorf retirees; email to Seymour

Date: Fri Oct 23, 09

Time: 3.00

Activity: Draft settlement proposal; correspondence with Forrest

Date: Mon Oct 26, 09

Time: 3.50

Activity: Telephone conference with Ron Hitt; telephone conference with Michelle Hallee; review El Paso drafts of damage claim procedure exhibits

Date: Tue Oct 27, 09

Time: 3.75

Activity: Draft and revise response to CNH's notice of supplemental authority; telephone conference with Forrest; review Judge Duggan's decision on CNH's accord and satisfaction defense

Date: Thu Oct 29, 09

Time: 5.00

Activity: Telephone conference with Dick Sanders; email to and from Saggau; email to Reynolds; email to Sanders; telephone conferences with reporters from Quad Cities' reporters; search and update retiree files; review Valko email re surviving spouses; email to Hecker; telephone conference with Gary Halsted; telephone conference with Andy Anderson; draft letter to retirees re remarriage; email to Michele Hallee; draft letter to Class Plaintiffs

Date: Fri Oct 30, 09

Time: 5.25

Activity: Telephone conference with Marshall; revise letter to Class Plaintiffs; revise letter to retirees re remarriage; review damage claims procedure and exhibits; review and update class database; correspondence with Forrest re claim procedure

Date: Mon Nov 2, 09

Time: 0.25

Activity: Telephone conference with Mrs. Maynard

Date: Thu Nov 5, 09

Time: 0.75

Activity: Email to Jeff Vasch of Local 180 re status

Date: Fri Nov 6, 09

Time: 0.25

Activity: Telephone conference with John Setty

Date: Sat Nov 7, 09

Time: 0.75

Activity: Email status report for Local 180

Date: Mon Nov 9, 09

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Wed Nov 11, 09

Time: 0.50

Activity: Review letter from Local 180 re Class Member deaths; modify database

Date: Thu Nov 12, 09

Time: 1.25

Activity: Review email from Penny Clark; email to Clark; revise correspondence to retirees re remarriage; telephone conference with Forrest re damage claim procedure

Date: Fri Nov 13, 09

Time: 1.00

Activity: Telephone conference with Charles Woods; telephone conference with Ray Rogers re United HealthCare issues; correspondence with Rutkowski

Date: Mon Nov 16, 09

Time: 0.50

Activity: Telephone conference with Mr. Haas; correspondence with Wright

Date: Tue Nov 17, 09

Time: 0.50

Activity: Telephone conference with Joann Moore; telephone conference with Antonio Garcia

Date: Thu Nov 19, 09

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Mon Nov 23, 09

Time: 1.75

Activity: Telephone conference with Kay Poggemiller; telephone conference with JoAnn Moore re Smothers; correspondence with Ms. Moore re claims; review UAW appeal brief in CNH v UAW; review documents from Setty re Norma Miller

Date: Tue Nov 24, 09

Time: 0.75

Activity: Telephone conference with John Setty; telephone conference with Ron Hitt; telephone conference with Dick Sanders

Date: Tue Dec 1, 09

Time: 3.00

Activity: Telephone conference with Dick Sanders; draft revisions; correspondence with Forrest; review documents re United HealthCare's lifetime maximum dispute; correspondence with Forrest

Date: Wed Dec 2, 09

Time: 6.00

Activity: Review 1990 group benefit plan; draft and revise letter to Forrest re UHC's assessment of charges against lifetime maximum; telephone conference with Forrest; review class lists re deaths and surviving spouses' eligibility; telephone conference with Royse Munson re Darlene Young; enter class data; review spreadsheet re Lifetime Maximum charges

Date: Thu Dec 3, 09

Time: 5.00

Activity: Review eligibility issues; correspondence with Forrest re class members missing from El Paso health care plan

Date: Fri Dec 4, 09

Time: 1.50

Activity: Telephone conference with Bill Jones; email to local benefit reps; review emails from Shanks and Rogers; review United HealthCare EOBs from Shanks

Date: Mon Dec 7, 09

Time: 0.50

Activity: Telephone conference with Elsie Teas; telephone conference with Tom Seymour; email to Seymour re lifetime maximum issue; telephone conference with Mary Jones

Date: Tue Dec 8, 09

Time: 0.25

Activity: Telephone conference with attorney for Bartels estate

Date: Thu Dec 10, 09

Time: 3.50

Activity: Telephone conference with Tom Seymour; telephone conference with Ron Hitt; correspondence with Forrest re lifetime maximum; correspondence with Forrest re settlement; telephone conference with Forrest re lifetime maximum issue; review Shanks email; revise data base

Date: Fri Dec 11, 09

Time: 1.25

Activity: Correspondence with Forrest re lifetime maximum issue; email to UAW and benefit representatives; correspondence with Mr. Penzkowski re case status; telephone conference with Forrest

Date: Mon Dec 14, 09

Time: 1.00

Activity: Correspondence with Forrest re Poggemiller check; correspondence with Miltenberger re litigation status; review Forrest letter re settlement; review EOBs re lifetime maximum

Date: Tue Dec 15, 09

Time: 0.25

Activity: Review letter from Forrest; email to Forrest

Date: Wed Dec 16, 09

Time: 0.25

Activity: Review list from Sanders re Type C lifetime maximum problem

Date: Mon Dec 21, 09

Time: 0.50

Activity: Telephone conference with Bill Jones; telephone conference with Carol Breuch re Bartels

Date: Tue Dec 22, 09

Time: 3.00

Activity: Correspondence with Forrest re Type C dispute; review EOBs and related documents; organize file re Type C documents; review damage claim process documents

Date: Wed Dec 23, 09

Time: 1.50

Activity: Telephone conference with Ron Hitt; review Forrest email; email Forrest re lifetime maximum issue; review Hotvedt letter; correspondence with Hotvedt; organize files

Date: Mon Dec 28, 09

Time: 0.75

Activity: Organize files; review Forrest correspondence

Date: Tue Dec 29, 09

Time: 1.00

Activity: Telephone conference with Sanders; email benefit reps re Type C lifetime maximum problem; telephone conference with John Setty; telephone conference with Dick Sanders

Date: Wed Dec 30, 09

Time: 0.75

Activity: Telephone conference with Kevin M. Local 180 benefit rep; review documents re Clair Johnson; email to Michele Hallee re Johnson pension

Date: Mon Jan 4, 10

Time: 0.25

Activity: Review email from Sanders; email to Sanders

Date: Tue Jan 5, 10

Time: 1.00

Activity: Telephone conference with George Santovi; telephone conference with Will Forrest; review email from Hallee re Bessie Johnson pension; review correspondence from Local 180 re class member deaths; email Local 180 re Charlie Lau's remarriage

Date: Wed Jan 6, 10

Time: 0.50

Activity: Telephone conference with Kevin M, Local 180 benefit rep.; correspondence with Forrest; review documents re Mrs. Yunk

Date: Thu Jan 7, 10

Time: 0.25

Activity: Telephone conference with Dick Sanders re mental health, vision providers; email to Sanders re injunction bond

Date: Fri Jan 8, 10

Time: 1.25

Activity: Review United HealthCare EOBs; correspondence with Forrest; telephone conference with George Lisnich

Date: Mon Jan 11, 10

Time: 0.25

Activity: Telephone conference with Tom Seymour

Date: Tue Jan 12, 10

Time: 6.25

Activity: Prepare for and attend conference with Forrest, Meisgeier, SCM and Linda C.; telephone conference with John Setty; telephone conference with Richard Johnson

Date: Thu Jan 21, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Sat Jan 23, 10

Time: 0.25

Activity: Telephone conference with Alfred Burns

Date: Mon Jan 25, 10

Time: 2.50

Activity: Telephone conference with John Setty; telephone conference with Kevin M. re Medicare Part B reimbursement; telephone conference with Nancy Siedlecki; draft revisions to exhibit 10 to damage claims procedure; email to Forrest

Date: Tue Jan 26, 10

Time: 0.50

Activity: Telephone conference with John Valko; telephone conference with Dick Sanders

Date: Wed Jan 27, 10

Time: 4.25

Activity: Telephone conference with Dick Sanders; review UHC EOBs; prepare for and attend settlement conference with Meisgeier, Camirillo, Forrest and SCM

Date: Thu Jan 28, 10

Time: 0.25

Activity: Telephone conference with Fran Gilchrist(2)

Date: Mon Feb 1, 10

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Tue Feb 2, 10

Time: 0.25

Activity: Telephone conference with Andy Anderson

Date: Wed Feb 3, 10

Time: 0.50

Activity: Telephone conference with Scott Gregory re actuary issues; telephone conference with Dick Sanders

Date: Thu Feb 4, 10

Time: 0.25

Activity: Telephone conference with Alliance Collections re Nancy K

Date: Fri Feb 5, 10

Time: 0.25

Activity: Telephone conference with John Setty

Date: Mon Feb 8, 10

Time: 0.50

Activity: Telephone conference with Tom Seymour; telephone conference with Bill Jones

Date: Tue Feb 9, 10

Time: 0.50

Activity: Telephone conference with Ed Schneider, actuary; telephone conference with Will Forrest

Date: Wed Feb 10, 10

Time: 0.50

Activity: Telephone conference with Kevin M re Torres; review changes from Local 180

Date: Thu Feb 11, 10

Time: 2.00

Activity: Telephone conference with Kay Poggemiller; correspondence with Poggemiller; review time records re Bendix litigation; email to Forrest; review Forrest email; correspondence with Forrest re Catherine Earl; review SS Death Index; correspondence with Forrest re Class Members missing from coverage lists

Date: Fri Feb 12, 10

Time: 1.00

Activity: Telephone conference with John Valko; prepare for conference call; telephone conference with Forrest and Meisgeier

Date: Tue Feb 16, 10

Time: 1.00

Activity: Telephone conference with Setty; create Terre Haute class list; email Setty; telephone conference with Saggau re settlement; review email from Sanders re Type C fiasco; review email from S. Harrell; email Harrell

Date: Mon Feb 22, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt; telephone conference with Bill Jones

Date: Wed Feb 24, 10

Time: 0.75

Activity: Telephone conference with Kevin M. re Torres; email to Forrest; review Forrest email

Date: Tue Mar 2, 10

Time: 1.00

Activity: Telephone conference with Sanders; review email re bond; review Forrest letter re refund checks; review emails re deaths from Local180; revise data base

Date: Fri Mar 5, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon Mar 8, 10

Time: 0.75

Activity: Correspondence with Catherine Earl; telephone conference with Elsie Teas; telephone conference with Dick Sanders re bond

Date: Tue Mar 9, 10

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Wed Mar 10, 10

Time: 0.75

Activity: Telephone conference with Alliance Collection; telephone conference with John Setty; review Rogers and Kevin M's emails re Blue Cross problems

Date: Thu Mar 11, 10

Time: 0.25

Activity: Telephone conference with Will Forrest

Date: Mon Mar 15, 10

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Thu Mar 18, 10

Time: 1.75

Activity: Telephone conference with Synnomon Harrell; telephone conference with Saggau; draft memo to Harrell re settlement and prescription drug issues

Date: Mon Mar 22, 10

Time: 0.25

Activity: Telephone conference with Kevin M, Local 180

Date: Tue Mar 23, 10

Time: 0.25

Activity: Telephone conference with Willie Curtis

Date: Wed Mar 24, 10

Time: 0.75

Activity: Telephone conference with Synnomon Harrell; telephone conference with Forrest

Date: Thu Mar 25, 10

Time: 0.75

Activity: Review and revise database

Date: Fri Mar 26, 10

Time: 1.00

Activity: Telephone conference with Ron Hitt; telephone conference with John Setty; telephone conference with James Marshall; telephone conference with Johann Moore

Date: Mon Mar 29, 10

Time: 1.00

Activity: Telephone conference with Mrs. Maynard; email to Hallee; correspondence with Forrest/Burchfield re Maynard; review Forrest email; email to Forrest

Date: Tue Mar 30, 10

Time: 1.50

Activity: Telephone conference with Synnomon Harrell(2); email to Forrest with questions re conference call.; telephone conference with Richard Johnson; review Hallee email re Maynard

Date: Thu Apr 1, 10

Time: 1.50

Activity: Prepare for and participate in conference call with Forrest, Camarillo, Meisgeier and Harrell

Date: Mon Apr 5, 10

Time: 1.00

Activity: Telephone conference with Andy Anderson; telephone conference with Mary Maynard; review Forrest email; email Forrest

Date: Tue Apr 6, 10

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Wed Apr 7, 10

Time: 0.50

Activity: Telephone conference with Dennis Galloway; telephone conference with Dick Sanders

Date: Fri Apr 9, 10

Time: 0.25

Activity: Review email from Forrest; email Forrest

Date: Mon Apr 12, 10

Time: 1.25

Activity: Telephone conference with Loretta Kramer re Ed Maynard; telephone conference with Dennis Galloway; telephone conference with Alliance Collection; review documents re Krzanowski and Cotrell

Date: Tue Apr 13, 10

Time: 2.00

Activity: Conference call with Meisgeier and Forrest; review and revise class member lists; email to Forrest

Date: Wed Apr 14, 10

Time: 1.25

Activity: Telephone conference with Bill Jones; telephone conference with Kevin M, Local 180; telephone conference with Jeff Vasch, VP Local 180; telephone conference with Chuck Shanks; review Shanks email

Date: Thu Apr 15, 10

Time: 0.50

Activity: Correspondence with Forrest re Maynard and Briddick

Date: Fri Apr 16, 10

Time: 0.25

Activity: Telephone conference with Dennis Galloway

Date: Mon Apr 19, 10

Time: 1.00

Activity: Review documents re coverage of CAT scans, MRIs, etc.

Date: Tue Apr 20, 10

Time: 4.00

Activity: Telephone conference with Ms. Klavega; telephone conference with Sam Armstrong; telephone conference with Dick Sanders; review records re MRI CT scan issue; review and update data base re class member deaths; review records from Alliance Collection re Krzanowski

Date: Wed Apr 21, 10

Time: 6.50

Activity: Review documents; correspondence with Forrest re BCBS denials of benefits for MRIs; email to benefit reps (2); review Saggau email; email Saggau; telephone conference with Setty; review email for Setty and Kevin M. of Local 180; correspondence with Forrest re denial of x-rays and mammograms; correspondence with Forrest re Krzanowski unpaid claims; draft order adding Mary Maynard as Plaintiff; email to Forrest and Rogaczewski; review class member deaths; telephone conference with Rogaczewski

Date: Thu Apr 22, 10

Time: 1.00

Activity: Telephone conference with Will Forrest; revise Order for Substitution of Mary Maynard for Edward Maynard; telephone conference with Bill Cox's son; review email from Kevin M., Local 180; email to Forrest re L. Duff

Date: Fri Apr 23, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Tue Apr 27, 10

Time: 1.75

Activity: Telephone conference with Bill Jones (2); review documents re nursing home care; correspondence with Forrest; telephone conference with Alliance Collection re Krzanowski; telephone conference with Dick Sanders; review documents re skilled nursing home

Date: Wed Apr 28, 10

Time: 0.50

Activity: Review documentation of prescription drug usage

Date: Thu Apr 29, 10

Time: 2.75

Activity: Telephone conference with Maureen Eisenman; telephone conference with Mrs. Stidmon; correspondence with Downing; telephone conference with Will Forrest; correspondence with Downing; correspondence with Stidmon; correspondence with Rutkowski; correspondence with Penzkowski; email to Kevin M. re Duff; organize file

Date: Fri Apr 30, 10

Time: 2.00

Activity: Review Marshfield Clinic statement re Krzanowski; correspondence with Forrest

Date: Mon May 3, 10

Time: 0.25

Activity: Review documents from Shanks and Anderson re problems with El Paso health care plan

Date: Tue May 4, 10

Time: 0.75

Activity: Telephone conference with John Setty; telephone conference with Dick Sanders (2)

Date: Fri May 7, 10

Time: 0.75

Activity: Telephone conference with Caroline Kuehnman re Ellen Spodick; telephone conference with John Setty; telephone conference with Burdette Lavine

Date: Mon May 10, 10

Time: 0.50

Activity: Telephone conference with Elsie Teas; review class action pleadings by AMA

Date: Tue May 11, 10

Time: 0.25

Activity: Telephone conference with Seymour

Date: Wed May 12, 10

Time: 1.00

Activity: Telephone conference with John Setty; telephone conference with Valko; telephone conference with Kevin Mieczkowski; telephone conference with George Lisnich

Date: Fri May 14, 10

Time: 0.25

Activity: Telephone conference with Mrs. Diamonte

Date: Tue May 18, 10

Time: 0.50

Activity: Telephone conference with Will Forrest; telephone conference with Dick Sanders

Date: Wed May 19, 10

Time: 0.50

Activity: Telephone conference with Kevin Mieczkoski; telephone conference with Forrest

Date: Thu May 20, 10

Time: 0.25

Activity: Review Forrest email; email Forrest

Date: Fri May 21, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Sat May 22, 10

Time: 0.50

Activity: Review settlement proposal

Date: Wed May 26, 10

Time: 0.25

Activity: Emails with Penny Clark re status

Date: Fri May 28, 10

Time: 3.50

Activity: Review settlement agreement; prepare for settlement discussions; telephone conference call with Forrest, Meisgeier and SCM; email Forrest re dependent coverage

Date: Wed Jun 2, 10

Time: 1.25

Activity: Correspondence with Plaintiffs re El Paso settlement proposal; telephone conference with Kizzie Bester; review documents re MRIs and CT Scans

Date: Thu Jun 3, 10

Time: 0.75

Activity: Correspondence with Forrest; review documents relating to MRIs, etc.

Date: Fri Jun 4, 10

Time: 0.75

Activity: Correspondence with S. Harrell; telephone conference with John Setty

Date: Mon Jun 7, 10

Time: 0.75

Activity: Telephone conference with Mrs. Torres; telephone conference with Mary Maynard

Date: Tue Jun 8, 10

Time: 0.50

Activity: Review *Wood* decision

Date: Wed Jun 9, 10

Time: 1.50

Activity: Telephone conference with Synnomon Harrell; review documents re BCBS administration of plan; organize file; review class member deaths; email Sherry Horton

Date: Thu Jun 10, 10

Time: 0.25

Activity: Telephone conference with Richard Johnson

Date: Mon Jun 14, 10

Time: 0.25

Activity: Telephone conference with Mary Maynard

Date: Wed Jun 16, 10

Time: 0.25

Activity: Telephone conference with Beverly Golden

Date: Thu Jun 17, 10

Time: 0.50

Activity: Correspondence with Forrest; review letter from Local 180; revise database

Date: Mon Jun 21, 10

Time: 0.75

Activity: Telephone conference with John Setty; telephone conference with Bill Jones; telephone conference with Dick Sanders

Date: Tue Jun 22, 10

Time: 0.25

Activity: Correspondence with Ms. Henry re Gladys Yolton

Date: Wed Jun 23, 10

Time: 0.25

Activity: Telephone conference with Kevin M., Local 180

Date: Fri Jun 25, 10

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Mon Jun 28, 10

Time: 0.50

Activity: Review Rogers' email; email to Rogers; review documents re unpaid MRIs and dental bills

Date: Tue Jun 29, 10

Time: 0.25

Activity: Telephone conference with daughter of Billie Jo Smothers

Date: Wed Jun 30, 10

Time: 0.25

Activity: Telephone conference with Forrest

Date: Thu Jul 1, 10

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Fri Jul 2, 10

Time: 0.50

Activity: Telephone conference with Gary Halsted

Date: Tue Jul 6, 10

Time: 0.25

Activity: Telephone conference with Sandy, Martha Lambert's daughter

Date: Wed Jul 7, 10

Time: 0.75

Activity: Telephone conference with Frank Rennison; telephone conference with Dick Sanders(2); email to Chuck Shanks

Date: Mon Jul 12, 10

Time: 0.25

Activity: Telephone conference with Elsie Teas; telephone conference with Terry Fern re Mary Salin; telephone conference with Elaine Torres

Date: Tue Jul 13, 10

Time: 0.25

Activity: Telephone conference with Forrest

Date: Fri Jul 16, 10

Time: 0.25

Activity: Telephone conference with Bill Jones; telephone conference with Thomas Bruech's office re Bartels

Date: Tue Jul 20, 10

Time: 0.25

Activity: Telephone conference with Sanders

Date: Thu Jul 22, 10

Time: 0.25

Activity: Telephone conference with Meisgeier

Date: Tue Jul 27, 10

Time: 0.50

Activity: Telephone conference with Dick Sanders (2)

Date: Thu Jul 29, 10

Time: 0.50

Activity: Telephone conference with Terri Fern; fax to Fern; review email for Seymour

Date: Mon Aug 2, 10

Time: 0.75

Activity: Telephone conference with Beverly Golden; telephone conference with Jim Marshall; telephone conference with Mr. Sheffler re Marion Parcus

Date: Tue Aug 3, 10

Time: 0.25

Activity: Review letter from Local 180; revise data base

Date: Wed Aug 4, 10

Time: 0.50

Activity: Telephone conference with Kevin Mieczkowski; telephone conference with Will Forrest

Date: Thu Aug 5, 10

Time: 4.25

Activity: Review settlement proposals; draft memo re settlement; correspondence with Forrest re MRIs; correspondence with Sheffler re Parcus; email Saggau re settlement discussions

Date: Fri Aug 6, 10

Time: 0.50

Activity: Telephone conference with Robin Powers; telephone conference with Helen Mason

Date: Tue Aug 10, 10

Time: 0.25

Activity: Telephone conference with Henry Malacara

Date: Fri Aug 13, 10

Time: 0.50

Activity: Telephone conference with Bill Jones; telephone conference with Will Forrest

Date: Sat Aug 14, 10

Time: 0.25

Activity: Review Saggau emails

Date: Mon Aug 16, 10

Time: 1.50

Activity: Review and revise joint motion; email to and from Forrest; email to Saggau re settlement; telephone conference with Nicholson

Date: Tue Aug 17, 10

Time: 0.50

Activity: Telephone conference call with Nicholson and Saggau

Date: Fri Aug 20, 10

Time: 0.25

Activity: Telephone conference with retiree from Kenosha; telephone conference with Saggau

Date: Tue Aug 24, 10

Time: 2.50

Activity: Prepare draft of settlement proposal

Date: Wed Aug 25, 10

Time: 0.50

Activity: Telephone conference with Forrest re settlement; discuss draft proposal with SCM; telephone conference with Galbraith re Gentry

Date: Thu Aug 26, 10

Time: 0.25

Activity: Telephone conference with John Setty

Date: Fri Aug 27, 10

Time: 5.50

Activity: Review and revise draft of settlement proposal; email Saggau re settlement proposal; review damage claim procedure documents; correspondence with Forrest re procedure; telephone conference with Billy Cox; review file and monthly lists re Cox; correspondence with Forrest re Cox; correspondence with Forrest re dependent coverage

Date: Mon Aug 30, 10

Time: 0.50

Activity: Telephone conference with Jo Ann Hall; telephone conference with Edward Hulsman

Date: Tue Aug 31, 10

Time: 0.75

Activity: Telephone conference with Ron Hitt; review Forrest email; email Forrest re damage procedure; organize files re BCBS denials

Date: Thu Sep 2, 10

Time: 0.25

Activity: Telephone conference with Forrest

Date: Tue Sep 7, 10

Time: 1.50

Activity: Review exhibits to damage procedure; correspondence with Santavi

Date: Wed Sep 8, 10

Time: 2.25

Activity: Correspondence with Irene King; review damage claims procedure

Date: Thu Sep 9, 10

Time: 4.00

Activity: Telephone conference with John Valko; review damage procedure exhibits; draft letter to Forrest re settlement; email Saggau

Date: Fri Sep 10, 10

Time: 6.75

Activity: Telephone conference with Paul Schaeffer, son of Helen Schaeffer; prepare for settlement discussions with Meisgeier and Forrest, review damage claim procedure documents; prepare binders; conference with SCM to prepare for meeting; meet with Meisgeier and Forrest

Date: Mon Sep 13, 10

Time: 0.25

Activity: Telephone conference with Elsie Teas; review Saggau email

Date: Tue Sep 14, 10

Time: 2.50

Activity: Correspondence with Anthony Trotta; review generic drug programs and cost of generic drugs; review Forrest letter and damage claim procedure

Date: Wed Sep 15, 10

Time: 6.50

Activity: Telephone conference with Kevin M. from Local 180; review El Paso's latest draft of damage claims procedure and Ex. 6 (Notice of Opportunity); review other proposed exhibits; correspondence with Forrest; emails to and from Saggau re settlement proposal; telephone conference with Saggau re settlement proposal

Date: Thu Sep 16, 10

Time: 4.25

Activity: Review class action notice re United HealthCare; telephone conference with Robert Axelrod, attorney for AMA; telephone conference with Forrest; draft letter to Class re AMA litigation against UHC; draft status letter to class re litigation; prepare mailing

Date: Mon Sep 20, 10

Time: 2.25

Activity: Review damage claims procedure and exhibits; review Sanders email; email to Sanders and others re letters to class

Date: Tue Sep 21, 10

Time: 2.50

Activity: Telephone conference with Patricia Mosley; telephone conference with Mary Jones; telephone conference with Will Forrest; telephone conference with Lela Moore; review El Paso's draft of damage claim procedure; correspondence with Forrest; emails to and from Forrest; telephone conference with Forrest re claims procedure

Date: Wed Sep 22, 10

Time: 2.75

Activity: Telephone conference with Ron Hitt; telephone conference with Angie, Metro MRI re Alice Womack; telephone conference with Robin Powers; telephone conference with Mrs. Michado; review El Paso's drafts to damage claim procedure and exhibits; email Forrest; review and enter Local 180 class updates; telephone conference with Ruby Jones; telephone conference with Bobbie Smith Garth

Date: Thu Sep 23, 10

Time: 0.75

Activity: Telephone conference with Don Matt re Susie Matt; telephone conference with Kizzie Bester; telephone conference with Josephine Booker

Date: Fri Sep 24, 10

Time: 0.50

Activity: Telephone conference with Saggau re settlement; telephone conference with Sandra Huxley

Date: Mon Sep 27, 10

Time: 0.50

Activity: Review email from Tom Hite; email Hite; telephone conference with Joann Wilson

Date: Wed Sep 29, 10

Time: 0.75

Activity: Review damage claim procedure re mailing requirements; correspondence with Forrest; telephone conference with Ms. Fleming

Date: Fri Oct 1, 10

Time: 0.25

Activity: Review October class lists from Forrest

Date: Mon Oct 4, 10

Time: 0.75

Activity: Telephone conference with Forrest; telephone conference with Valko; review premium payment list

Date: Wed Oct 6, 10

Time: 0.25

Activity: Telephone conference with Dick Sanders

Date: Mon Oct 11, 10

Time: 6.50

Activity: Telephone conference with Mike Saggau; review and input damage claims

Date: Tue Oct 12, 10

Time: 10.50

Activity: Review and input premium information; review summation data base re missing claim information; telephone conference with Vicki Boldus

Date: Wed Oct 13, 10

Time: 5.00

Activity: Review spreadsheets re premium payments to El Paso; correspondence with Forrest re El Paso premium payments

Date: Thu Oct 14, 10

Time: 0.25

Activity: Telephone conference with Ronald Newman

Date: Fri Oct 15, 10

Time: 0.25

Activity: Correspondence with Irene King

Date: Mon Oct 18, 10

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Tue Oct 26, 10

Time: 0.25

Activity: Telephone conference with River Bend Dental re Sherry Hamilton

Date: Wed Oct 27, 10

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Thu Oct 28, 10

Time: 0.25

Activity: Telephone conference with Billy Cox

Date: Mon Nov 1, 10

Time: 0.50

Activity: Work on damage claims; enter premiums in damage claim form

Date: Tue Nov 2, 10

Time: 1.25

Activity: Work on premium claims; email to Forrest

Date: Wed Nov 3, 10

Time: 1.50

Activity: Work on damage claims; correspondence with Forrest re Tyykila premium contributions; review Forrest email re duplicates

Date: Thu Nov 4, 10

Time: 4.25

Activity: Email to Saggau; review El Paso's premium lists; correspondence with Forrest re premium lists

Date: Fri Nov 5, 10

Time: 0.25

Activity: Emails to and from Saggau

Date: Mon Nov 8, 10

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Tue Nov 9, 10

Time: 2.00

Activity: Telephone conference with Mary Maynard; review Saggau email; email to Saggau; review and compare damage claim lists

Date: Wed Nov 10, 10

Time: 0.50

Activity: Correspondence with Sarah Thomas; review El Paso SEC filings

Date: Thu Nov 11, 10

Time: 0.50

Activity: Telephone conference with Virginia Pierce re COBRA; telephone conference with Saggau

Date: Fri Nov 12, 10

Time: 3.25

Activity: Conference with Saggau, Synnomon Harrell and Sam re settlement; review class lists re damages

Date: Mon Nov 15, 10

Time: 6.00

Activity: Telephone conference with John Setty; compare coverage lists and enter data re changes; prepare damage claim forms; update information

Date: Tue Nov 16, 10

Time: 6.00

Activity: Telephone conference with Mary Ann Jones; telephone conference with Ron Hitt; review and revise damage data base

Date: Wed Nov 17, 10

Time: 1.75

Activity: Review class lists; review email from Kathy Chambers; email to Chambers; telephone conference with Kevin M, Local 180; telephone conference with Saggau re settlement; correspondence with Forrest re deceased class members

Date: Thu Nov 18, 10

Time: 1.00

Activity: Telephone conference with Chuck Shanks; telephone conference with Hecker (3); telephone conference with Saggau

Date: Mon Nov 22, 10

Time: 1.00

Activity: Revise data base for Social Security analysis; email to Synnomon Harrell; email to Saggau re status

Date: Mon Nov 29, 10

Time: 6.75

Activity: Review spreadsheet re duplicate SSN; review database; revise spreadsheet; email Forrest; review and revise damages database; telephone conference with Bill Jones; telephone conference with John Setty

Date: Tue Nov 30, 10

Time: 3.50

Activity: Work on damage database

Date: Wed Dec 1, 10

Time: 4.00

Activity: Work on damage calculations; email to Forrest

Date: Thu Dec 2, 10

Time: 0.75

Activity: Telephone conference with Bill Jones; review Forrest emails re social security numbers; review database re social security numbers

Date: Fri Dec 3, 10

Time: 2.75

Activity: Work on social security number discrepancies for damage database; telephone conference with Mary Wilson; correspondence with Forrest re social security numbers; telephone conference with Dorothy Comstock; review email from Harrell re cost of drugs

Date: Fri Dec 10, 10

Time: 0.25

Activity: Telephone conference with Willie Curtis; telephone conference with Lula McLain

Date: Mon Dec 13, 10

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Wed Dec 15, 10

Time: 2.00

Activity: Telephone conference with John Setty; review Forrest email; review documents re social security numbers; email to Forrest; review Saggau email; email to Saggau; review email from Seymour; work on class database; review email from Kevin M, Local 180; email to Kevin M.

Date: Fri Dec 17, 10

Time: 1.50

Activity: Review Forrest email; review documents; correspondence with Forrest re social security numbers and eligibility questions; review letter from Local 180; email Local 180; input data re deaths

Date: Tue Dec 21, 10

Time: 4.00

Activity: Prepare for and attend conference with Dennis Williams, Sam and Mike Saggau; telephone conference with Saggau; revise settlement agreement term sheet

Date: Wed Dec 22, 10

Time: 3.75

Activity: Telephone conference with Henry Malacara; revise settlement proposal; revise letter to Forrest re settlement proposal; correspondence with Saggau re settlement proposal; telephone conference with Dick Sanders; telephone conference with Ron Hitt; correspondence with attorney Siedlecki re Sawicki estate

Date: Thu Dec 23, 10

Time: 4.50

Activity: Revise settlement proposal and letter to Forrest; email to Forrest; organize file re United Health Care and BCBS benefit non payment

Date: Mon Dec 27, 10

Time: 0.75

Activity: Organize files

Date: Tue Dec 28, 10

Time: 1.00

Activity: Correspondence with Forrest re Krzanowski; telephone conference with damage claim information; review email from Forrest; email Forrest

Date: Thu Dec 30, 10

Time: 2.25

Activity: Review Forrest email; organize documents; work on damage claims procedure questions; correspondence with Forrest

Date: Mon Jan 3, 11

Time: 0.25

Activity: Review Sanders email; email Sanders

Date: Tue Jan 4, 11

Time: 0.25

Activity: Telephone conference with Jim Marshall

Date: Wed Jan 5, 11

Time: 1.25

Activity: Telephone conference with Nancy Siedlicki re Sawicki estate; review and record deaths; modify damage data base; work on damage and class issues

Date: Thu Jan 6, 11

Time: 0.75

Activity: Review documents and damage data base re Navistar retirees; email Forrest re Navistar retirees

Date: Tue Jan 11, 11

Time: 0.25

Activity: Telephone conference with Wilbur Montgomery

Date: Thu Jan 13, 11

Time: 0.75

Activity: Telephone conference with Alliance Collection re Krzanowski; revise data base and damage data base; correspondence with Forrest re duplicate premium payments

Date: Fri Jan 14, 11

Time: 2.00

Activity: Telephone conference with Setty; telephone conference with Forrest; review document database re damage documentation; create spreadsheet; email Forrest; correspondence with Siedlecki re Sawicki

Date: Wed Jan 19, 11

Time: 0.25

Activity: Review email for Local re deaths, etc

Date: Mon Jan 24, 11

Time: 0.50

Activity: Review email from Seymour; email Seymour; input info re retiree deaths in data bases

Date: Tue Feb 1, 11

Time: 0.25

Activity: Telephone conference with Will Forrest; telephone conference with

Date: Thu Feb 3, 11

Time: 2.25

Activity: Telephone conference with Meisgeier, Forrest, Camarillo and Sam; organized file; telephone conference with Frances Penzkowski; telephone conference with Robert Weiland

Date: Fri Feb 4, 11

Time: 2.25

Activity: Review Forrest email; review El Paso damage list; review outstanding issues; correspondence with Forrest re damage issues

Date: Tue Feb 8, 11

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Wed Feb 9, 11

Time: 5.50

Activity: Review and compare El Paso premium data from recent list with damage data base;
enter class data

Date: Thu Feb 10, 11

Time: 3.75

Activity: Review El Paso spreadsheet re premiums; correspondence with Forrest re
premium/damage issues

Date: Fri Feb 11, 11

Time: 7.00

Activity: Work on damage issues

Date: Sat Feb 12, 11

Time: 1.50

Activity: Wok on premium damages

Date: Mon Feb 14, 11

Time: 2.50

Activity: Work on premium damages issues

Date: Tue Feb 15, 11

Time: 8.00

Activity: Conference with Meisgeier, Forrest, Camarillo and McKnight re settlement; review
El Paso damage lists and backup documentation

Date: Wed Feb 16, 11

Time: 7.00

Activity: Prepare for and attend settlement discussions with Meisgeier, Forrest and
McKnight; revise data bases re class changes; telephone conference with Local 180
president and benefits rep; draft settlement agreement

Date: Thu Feb 17, 11

Time: 4.75

Activity: Draft settlement agreement; email Kathy Chambers re Dot Chambers; telephone
conference with Ron Hitt; telephone conference with Bill Jones; email to Sherry,
Local 180

Date: Fri Feb 18, 11

Time: 6.00

Activity: Draft and revise settlement agreement; correspondence with class representatives re settlement

Date: Mon Feb 21, 11

Time: 7.00

Activity: Work on damage issues

Date: Tue Feb 22, 11

Time: 6.00

Activity: Review damage information; revise settlement agreement

Date: Wed Feb 23, 11

Time: 3.75

Activity: Telephone conference with Forrest; draft and revise settlement agreement; telephone conference with Mary Maynard; review estate information on Barbara Freeman

Date: Thu Feb 24, 11

Time: 6.75

Activity: Review and revise settlement agreement; correspondence with Hotdelt re Monroe; correspondence with Smith re Freeman; draft exhibit list; draft El Paso Corp guaranty; correspondence with Forrest; revise class and damage database

Date: Fri Feb 25, 11

Time: 0.50

Activity: Review email from Forrest; email to Forrest re settlement agreement

Date: Mon Feb 28, 11

Time: 0.25

Activity: Review documents re Type C expenses for Chuck Shanks

Date: Tue Mar 1, 11

Time: 3.50

Activity: Draft final judgment exhibit; draft Notice of Preliminary Approval; draft final claims order exhibit; draft order of preliminary approval exhibit

Date: Wed Mar 2, 11

Time: 2.25

Activity: Telephone conference with Synnomon Harrell; telephone conference with Dick Sanders; review and reconcile damage spreadsheets

Date: Thu Mar 3, 11

Time: 4.25

Activity: Revise settlement exhibits; review damage spreadsheets; email to Forrest; review Forrest email

Date: Fri Mar 4, 11

Time: 0.25

Activity: Telephone conference with Gary Halsted

Date: Mon Mar 7, 11

Time: 4.50

Activity: Review premium damage spreadsheets; try to reconcile differences

Date: Tue Mar 8, 11

Time: 9.00

Activity: Work on damages and class issues

Date: Wed Mar 9, 11

Time: 4.75

Activity: Work on premium damage and class issues; correspondence with Forrest re settlement; telephone conference with Saggau; email Saggau

Date: Thu Mar 10, 11

Time: 0.50

Activity: Telephone conference with Forrest; telephone conference with Virginia Pierce

Date: Fri Mar 11, 11

Time: 0.25

Activity: Telephone conference with Joann Moore re Billy Smothers; telephone conference with Virginia Pierce

Date: Mon Mar 14, 11

Time: 0.50

Activity: Telephone conference with John Setty; telephone conference with Barbara Hick's daughter

Date: Tue Mar 15, 11

Time: 1.50

Activity: Telephone conference with Paul View; telephone conference with Synnomon Harrell; review El Paso's SPD draft

Date: Wed Mar 16, 11

Time: 6.50

Activity: Email to Synnomon Harrell; telephone conference with Forrest(2); review 1990 and 1998 Group Benefit Plans; review and edit El Paso SPD

Date: Thu Mar 17, 11

Time: 2.00

Activity: Draft SPD revisions; telephone conference with SCM, Forrest and Meisgeier;
telephone conference with Saggau

Date: Fri Mar 18, 11

Time: 2.50

Activity: Draft revisions to El Paso's SPD; email to S. Harrell; prepare for meetings with El
Paso

Date: Sat Mar 19, 11

Time: 0.25

Activity: Telephone conference with Forrest

Date: Mon Mar 21, 11

Time: 0.25

Activity: Telephone conference with Forrest

Date: Tue Mar 22, 11

Time: 7.50

Activity: Travel from Detroit to Houston

Date: Wed Mar 23, 11

Time: 8.00

Activity: Attend settlement discussions with Meisgeier, Forrest, Malone and Camarillo

Date: Thu Mar 24, 11

Time: 11.00

Activity: Prepare for and attend settlement discussions with Malone, Meisgeier, Forrest and
Camarillo; review El Paso SPDs

Date: Fri Mar 25, 11

Time: 12.00

Activity: Settlement discussions with Forrest, Meisgeier and Camarillo; draft class counsel
letter exhibit; travel from Houston to Detroit

Date: Mon Mar 28, 11

Time: 4.50

Activity: Telephone conference with Ron Hitt; draft SPD; telephone conference with Forrest;
revise damage data base

Date: Tue Mar 29, 11

Time: 8.50

Activity: Telephone conference with Charles Colley; draft and revise SPD; review Forrest
emails

Date: Wed Mar 30, 11

Time: 7.00

Activity: Draft revisions to SPD; telephone conference with Charles Colley's daughter; correspondence with Forrest re SPD; telephone conference with Forrest; review fax from Colley; correspondence with Forrest re Colley

Date: Thu Mar 31, 11

Time: 8.50

Activity: Draft class counsel letter; email Sherry, Local 180; review document database re social security numbers; email Forrest; prepare for and attend meeting with Forrest, Malone, Meisgeier and Camarillo; draft list of United HealthCare issues; review United HealthCare denials

Date: Fri Apr 1, 11

Time: 7.50

Activity: Prepare for and attend settlement discussions

Date: Mon Apr 4, 11

Time: 0.25

Activity: Email to Will Forrest re escrow refunds

Date: Tue Apr 5, 11

Time: 5.25

Activity: Telephone conference with Michele Robinson; review damage claim database with Michele Robinson; review UHV and BCBS denials; review Post-10-3-93 retirees

Date: Wed Apr 6, 11

Time: 5.75

Activity: Telephone conference with Dick Sanders; correspondence with Downing; correspondence with Werner, attorney for Peel; correspondence with Smith re Freeman; telephone conference with Teresa Jackson re William Greer; review database re Post October 1993 Class Members; email to Forrest

Date: Thu Apr 7, 11

Time: 2.75

Activity: Review UHC claim denial categories

Date: Fri Apr 8, 11

Time: 0.50

Activity: Telephone conference with Forrest; draft memos re UHC and BCBS claim denials

Date: Sat Apr 9, 11

Time: 0.50

Activity: Prepare for settlement discussions in Houston

Date: Wed Apr 13, 11

Time: 8.00

Activity: Travel to Houston

Date: Thu Apr 14, 11

Time: 9.50

Activity: Review settlement agreement exhibits; settlement discussions with Forrest, Meisgeier, Malone and Camarillo in Houston

Date: Fri Apr 15, 11

Time: 12.00

Activity: Settlement discussions in Houston; travel to Detroit

Date: Mon Apr 18, 11

Time: 1.00

Activity: Telephone conference with Kevin Mieczkowski; telephone conference with Bill Jones; telephone conference with Forrest; correspondence with Rutkowski; correspondence with Werner re Peel

Date: Tue Apr 19, 11

Time: 5.00

Activity: Draft revisions to settlement agreement re damage procedure

Date: Wed Apr 20, 11

Time: 3.50

Activity: Revise settlement agreement and damage claim procedure; review Forrest email; email Forrest; review El Paso edits to settlement agreement; telephone conference with Will Forrest

Date: Thu Apr 21, 11

Time: 3.00

Activity: Draft and revise tolling agreement; telephone conference with Saggau; telephone conference with Forrest; emails to and from Saggau; telephone conference with SCM (2)

Date: Fri Apr 22, 11

Time: 0.50

Activity: Email to Synnomon Harrell re SPD; email to Shanks re UHC and BCBS denial issues; telephone conference with Ron Pearce

Date: Mon Apr 25, 11

Time: 2.75

Activity: Telephone conference with William Forrest; work on damages; telephone conference with Ron Hitt

Date: Tue Apr 26, 11

Time: 4.25

Activity: Telephone conference with Dick Sanders; review and revise Section 16 to settlement agreement; email to Forrest; correspondence with Elsie Teas; review indemnification agreement and research on implied contract terms

Date: Wed Apr 27, 11

Time: 5.50

Activity: Telephone conference with Kevin M., Local 180 benefit representative; review SPD revisions; telephone conference with Wilbur Montgomery; review guaranty; review El Paso Settlement Agreement revisions; review damage data base; email damage data base to Forrest; prepare for settlement discussions; email Harrell; review email from Kevin M re benefit denials

Date: Thu Apr 28, 11

Time: 6.00

Activity: Prepare for and attend settlement discussions; review benefit denial documents

Date: Mon May 2, 11

Time: 0.25

Activity: Email from Forrest

Date: Tue May 3, 11

Time: 0.25

Activity: Telephone conference with Mary Maynard

Date: Wed May 4, 11

Time: 5.50

Activity: Draft and revise authorized claims procedure; settlement agreement

Date: Thu May 5, 11

Time: 0.50

Activity: Conference with Nicholson and Saggau re status

Date: Fri May 6, 11

Time: 3.75

Activity: Work on revisions to Settlement Agreement, damage claim procedure and damage claim form; conference call with Forrest and Meisgeier

Date: Mon May 9, 11

Time: 1.75

Activity: Telephone conference with Will Forrest; review tolling agreement revisions; email to Saggau; review SPD and Firestone decision re arbitrary and capricious standard

Date: Tue May 10, 11

Time: 3.25

Activity: Email to Kathy Chambers; work on damage procedure issues; email to Forrest; telephone conference with John Setty

Date: Thu May 12, 11

Time: 1.25

Activity: Review Forrest emails; email Forrest; telephone conference with Forrest; review revisions to damage claim procedure

Date: Fri May 13, 11

Time: 0.50

Activity: Telephone conference with Forrest; email to Michele Hallee

Date: Mon May 16, 11

Time: 4.00

Activity: Work on settlement issues

Date: Tue May 17, 11

Time: 7.00

Activity: Email to Hallee re automatic spouse pension; work on automatic spouse pension issue; correspondence with Forrest; work on authorized claim procedure; email Forrest; review emails from Kevin M., Local 180; email Kevin M.; prepare for settlement negotiations

Date: Wed May 18, 11

Time: 8.00

Activity: Travel to Houston; prepare for settlement discussions

Date: Thu May 19, 11

Time: 10.00

Activity: Prepare for and attend settlement discussions

Date: Fri May 20, 11

Time: 12.00

Activity: Attend settlement discussions; email Forrest; travel from Houston to Detroit

Date: Mon May 23, 11

Time: 1.00

Activity: Telephone conference with Ron Hitt; work on tolling agreement; work on automatic spouse issue; email Forrest

Date: Tue May 24, 11

Time: 0.50

Activity: Telephone conference with Forrest; work on tolling agreement

Date: Wed May 25, 11

Time: 4.50

Activity: Telephone conference with Larry Smith re Freeman; telephone conference with Peggy Clark, Judith Miller and SCM; telephone conference with McKnight and Saggau; research re vacating appellate decisions; revise exhibits to authorized claim procedure; research re summary plan descriptions

Date: Thu May 26, 11

Time: 5.25

Activity: Telephone conference with Sam and Saggau; telephone conference with Forrest(2); draft exhibits to authorized claim procedure - claim instruction forms, 4a, 4b and 4c; telephone conference with Forrest and Marilyn, Judge Duggan's clerk; review Release, ex. 13; draft revisions to ex. 5 - notice

Date: Fri May 27, 11

Time: 5.00

Activity: Draft and revise ex. 5 - notice of opportunity to file claim; email to Forrest; telephone conference with Jim Marshall; draft and revise ex. 9a - authorized claim form; review Local 180 data updates

Date: Tue May 31, 11

Time: 7.25

Activity: Telephone conference with Larry Smith re Freeman; correspondence with Smith; review emails from Forrest; draft exhibits to authorized claim procedure; work with Michele Robinson on changes to data base; enter data into data base

Date: Wed Jun 1, 11

Time: 2.00

Activity: Telephone conference with Will Forrest; telephone conference with Ronald Pearce; email Pearce; input data into master table and damage data base; review and revise El Paso drafts to authorized claim procedure exhibits 11, 13 and 14

Date: Thu Jun 2, 11

Time: 9.50

Activity: Travel to Birmingham to meet with El Paso lawyers re settlement; draft exhibits to authorized claim procedure and settlement agreement; email to Forrest; email Local 180 re status

Date: Fri Jun 3, 11

Time: 8.00

Activity: Travel to Birmingham; conference with Forrest and Meisgeier; draft revisions to settlement agreement exhibits

Date: Mon Jun 6, 11

Time: 2.25

Activity: Work on surviving spouse issue; create query; instruct clerk; review Forrest email; telephone conference with Ms. Christman re L. Margaret Roberts; work on settlement exhibits

Date: Tue Jun 7, 11

Time: 0.75

Activity: Revise Ex H - order of preliminary approval; email Forrest; telephone conference with Nancy Christman

Date: Wed Jun 8, 11

Time: 0.25

Activity: Telephone conference with Bill Jones

Date: Mon Jun 13, 11

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Thu Jun 16, 11

Time: 0.75

Activity: Telephone conference with Setty; organize file

Date: Fri Jun 17, 11

Time: 0.25

Activity: Telephone conference with Peggy Yowell

Date: Tue Jun 21, 11

Time: 0.50

Activity: Telephone conference with Forrest; work on Tolling Agreement

Date: Wed Jun 22, 11

Time: 0.25

Activity: Review Kevin M. email; email to Kevin M.

Date: Thu Jun 23, 11

Time: 0.25

Activity: Telephone conference with Elsie Teas

Date: Mon Jun 27, 11

Time: 0.25

Activity: Telephone conference with Ron Hitt

Date: Tue Jun 28, 11

Time: 7.50

Activity: Review and revise settlement agreement and exhibits; review Forrest emails and El Paso revisions; email Forrest; research re preliminary injunctions

Date: Wed Jun 29, 11

Time: 8.00

Activity: Telephone conference with Kevin M. re Indemnity Plan problems; settlement conference with Forrest and Meisgeier; review SPD; review settlement agreement exhibits

Date: Thu Jun 30, 11

Time: 11.00

Activity: Draft settlement exhibits; research El Paso Corp financials; prepare for and attend settlement discussions with Forrest and Meisgeier; research re dependent spouses

Date: Fri Jul 1, 11

Time: 7.25

Activity: Attend settlement discussions with Sam, Forrest and Meisgeier; draft settlement exhibits; work on dependent spouse issues

Date: Fri Jul 8, 11

Time: 0.25

Activity: Telephone conference with Forrest

Date: Mon Jul 11, 11

Time: 0.25

Activity: Review July Invoice; work on finalizing class list exhibit

Date: Tue Jul 12, 11

Time: 0.50

Activity: Telephone conference with Meisgeier; telephone conference with Edith Baxter

Date: Fri Jul 15, 11

Time: 1.50

Activity: Telephone conference with Richard Wiles; email to Saggau; work on final class list exhibit

Date: Tue Jul 19, 11

Time: 7.00

Activity: Review and revise class lists; revise Joint Motion for Approval; revise fail safe letter

Date: Wed Jul 20, 11

Time: 2.50

Activity: Telephone conference with Elsie Teas; telephone conference with John Stutt; telephone conference with Will Forrest; review and revise Joint Motion for Approval of Settlement; email Forrest; draft outstanding medical expense claim letter

Date: Thu Jul 21, 11

Time: 3.00

Activity: Review and revise failsafe letter and outstanding medical expense letter; email to Forrest; correspondence with Nicholson on Duff and Tarwid; telephone conference with Dean Nash re Paula Randolph; email Nash re Randolph; telephone conference with Kevin M., Local 180 benefit rep

Date: Fri Jul 22, 11

Time: 4.75

Activity: Telephone conference with John Setty; email benefits reps re outstanding medical expenses; prepare Class Lists, Ex. B. F and J; correspondence with Forrest re lists; telephone conference with Will Forrest

Date: Mon Jul 25, 11

Time: 4.50

Activity: Telephone conference with Nancy Christman; telephone conference with Ron Hitt; email to Hitt; review proposed orders; review eligibility attestation forms; review dependent spouse data base; telephone conference with Setty; review individual files; search data base and death index re dependent spouses; email Forrest

Date: Tue Jul 26, 11

Time: 2.50

Activity: Telephone conference with Forrest (2); review and revise credit support and successor provisions; review email for Rogers; email Rogers; emails to and from Kevin M.; telephone conference with Forrest and Meisgeier; telephone conference with Elizabeth Gillard; telephone conference with Dick Sanders

Date: Wed Jul 27, 11

Time: 2.75

Activity: Review and revise escrow agreement provisions; email McKnight

Date: Thu Jul 28, 11

Time: 6.25

Activity: Revise Orders relating to Tolling Agreement; revise claim forms; emails to Forrest (2); revise provisions re credit support; draft Motion for Attorney Fees; organize settlement agreement; review attorney fee time and costs; telephone conference with SCM

Date: Fri Jul 29, 11

Time: 4.75

Activity: Telephone conference with Tom Friedman re Gillard; telephone conference with Meisgeier (2); organize and review settlement agreement and exhibits; revise escrow provisions; email to Forrest

Total Hours: 6573.75

ATTORNEY HOURS
Samuel McKnight (Through July 31, 2011)

Date: Tue Jan 6, 04

Time: 0.50

Activity: Review decision re bond issues

Date: Fri Jan 9, 04

Time: 0.50

Activity: Review Court Order and production of documents

Date: Tue Jan 13, 04

Time: 1.75

Activity: Telephone conferences with several witnesses; review Decision; telephone conference with Anderson re bond issues

Date: Fri Feb 27, 04

Time: 0.25

Activity: Review file re discovery issues and strategy

Date: Tue Mar 16, 04

Time: 0.75

Activity: Review documents and correspondence re injunction compliance; work on correspondence to Case and El Paso

Date: Fri Mar 26, 04

Time: 3.75

Activity: Work on compliance with injunction; telephone conference with the Court; research re contempt; review correspondence and documents re compliance

Date: Tue Mar 30, 04

Time: 2.00

Activity: Review various materials re non-compliance with preliminary injunction; research re contempt; work on Motion and Brief

Date: Wed Mar 31, 04

Time: 4.00

Activity: Review documents and correspondence re non-compliance with preliminary injunction; research re contempt; work on Motion and Brief; telephone conference with El Paso counsel

Date: Thu Apr 1, 04

Time: 2.00

Activity: Review correspondence and documents re compliance; several telephone conferences with El Paso attorneys; draft and revise correspondence outlining compliance steps

Date: Fri Apr 2, 04

Time: 1.25

Activity: Several telephone conferences with counsel for El Paso; draft correspondence to all counsel re compliance steps to be take immediately

Date: Mon Apr 5, 04

Time: 2.50

Activity: Review numerous documents re compliance; work on specifics re reinstatement and reimbursement; draft additional correspondence re compliance steps; review file re settlement; telephone conference with counsel for El Paso

Date: Tue Apr 6, 04

Time: 4.50

Activity: Prepare for and attend settlement conference

Date: Wed Apr 7, 04

Time: 1.25

Activity: Correspondence with Case and El Paso re compliance; review and organize materials re compliance

Date: Thu Apr 15, 04

Time: 0.50

Activity: Review file and pleadings re bond issues

Date: Fri Apr 16, 04

Time: 2.50

Activity: Review Subpoenas and Court Rules; work on discovery issues re bond hearing; correspondence with Case and El Paso attorneys; telephone conference with Case attorneys

Date: Mon Apr 19, 04

Time: 1.50

Activity: Review correspondence and documents re privilege and production and discovery in bond hearing; work on Motion to Partially Quash and privilege log

Date: Fri Apr 23, 04

Time: 0.25

Activity: review corresp re bond hearing discovery

Date: Tue May 4, 04

Time: 0.50

Activity: Telephone conference with El Paso attorneys

Date: Mon May 17, 04

Time: 2.00

Activity: Review materials from El Paso re plan redesign; review file re settlement meetings; review Sixth Circuit Court of Appeals correspondence; participate in Sixth Circuit Court of Appeals mediation conference

Date: Tue May 18, 04

Time: 1.75

Activity: Review pleadings and rules re Sixth Circuit Court of Appeals settlement conference; review settlement issues; draft correspondence to all counsel re settlement issues, information and confidentiality

Date: Mon May 24, 04

Time: 1.00

Activity: Telephone conferences with various counsel re settlement meeting; correspondence re date for settlement meeting

Date: Tue May 25, 04

Time: 1.00

Activity: Review correspondence; draft correspondence to defense counsel re Dett's discussions; investigate re negotiations

Date: Mon Jun 14, 04

Time: 4.50

Activity: Review information from El Paso; research re various settlement issues; review file re negotiations; telephone conference with Atwood

Date: Tue Jun 15, 04

Time: 12.00

Activity: Prepare for and attend settlement conference in Chicago

Date: Wed Jun 16, 04

Time: 1.50

Activity: Organize settlement materials; telephone conference with defense counsel and with 6th Circuit Court Mediator re status of settlement talks

Date: Thu Jun 17, 04

Time: 1.50

Activity: Telephone conference with El Paso attorneys; review materials re plan options and Medicare

Date: Fri Jun 18, 04

Time: 1.00

Activity: Work on settlement calculations; correspondence with defense counsel re medical costs paid by retirees

Date: Mon Jun 21, 04

Time: 1.50

Activity: Review settlement file; telephone conference with Atwood; attend settlement conference with the Sixth Circuit Court of appeals; organize file

Date: Tue Jun 22, 04

Time: 2.00

Activity: Telephone conference with Atwood; review file; work on settlement term sheet

Date: Thu Jun 24, 04

Time: 2.75

Activity: Work on settlement proposal; conference with UAW Representatives re settlement proposal

Date: Mon Jun 28, 04

Time: 0.50

Activity: Review settlement materials

Date: Wed Jul 7, 04

Time: 0.75

Activity: Review file re status of case and settlement negotiations

Date: Fri Jul 9, 04

Time: 1.25

Activity: Attend settlement conference in Sixth Circuit Court of Appeals

Date: Tue Jul 13, 04

Time: 1.00

Activity: Review settlement materials and materials re Medicare carve out and coordination

Date: Wed Jul 21, 04

Time: 1.25

Activity: Work on information re prescription drug programs

Date: Thu Jul 22, 04

Time: 4.00

Activity: Prepare for and attend settlement conference; telephone conference with Atwood

Date: Fri Aug 6, 04

Time: 4.00

Activity: Review Appeal Briefs

Date: Mon Aug 9, 04

Time: 2.50

Activity: Review Appeal Briefs

Date: Tue Aug 10, 04

Time: 1.00

Activity: Review draft of Facts and Appeal Brief

Date: Mon Aug 16, 04

Time: 3.25

Activity: Draft Motion for Extension to File Appeal Brief; telephone conference with Sixth Circuit Court; telephone conference with El Paso; review Appeal Briefs

Date: Thu Aug 19, 04

Time: 1.50

Activity: Telephone conference with Sixth Circuit Court; review Case Opposition to Extension

Date: Fri Aug 20, 04

Time: 2.25

Activity: Review Case Opposition to Extension; telephone conference with Sixth Circuit Court; review files re various court orders and pleadings; draft Response to Case's Opposition to Extension

Date: Wed Sep 8, 04

Time: 4.00

Activity: Review Sixth Circuit Appeal Briefs by Case and El Paso

Date: Thu Sep 9, 04

Time: 5.00

Activity: Review Appeal Briefs to Sixth Circuit; research; work on Reply

Date: Mon Sep 13, 04

Time: 2.25

Activity: Review and revise Reply to Case Sixth Circuit Appeal Brief

Date: Tue Sep 14, 04

Time: 8.50

Activity: Research and work on Sixth Circuit Reply Briefs to Case and El Paso Appeal Briefs

Date: Wed Sep 15, 04

Time: 10.50

Activity: Work on and finalize Reply Brief to El Paso Sixth Circuit Appeal and Reply Brief to Case Sixth Circuit Appeal; review files re preparation for Sixth Circuit settlement conference

Date: Thu Sep 16, 04

Time: 11.00

Activity: Prepare for and attend settlement conference with Sixth Circuit Court of Appeals

Date: Fri Sep 17, 04

Time: 0.75

Activity: Organize file materials re settlement conferences and plan design issues

Date: Thu Sep 23, 04

Time: 1.75

Activity: Review Employer briefs re reconsideration of indemnity issues; review file re preserving issues re intent of FAS 106 letter

Date: Mon Sep 27, 04

Time: 4.00

Activity: Work on Supplemental Brief re preserving issue of UAW/Case understanding of FAS 106 letter; review various documents and depositions

Date: Mon Nov 15, 04

Time: 3.50

Activity: Review various decisions re Case and El Paso counterclaims; correspondence with pre-IPO retiree and personal attorney re status of reimbursement issues; telephone conference with retiree re status

Date: Thu Jan 27, 05

Time: 1.00

Activity: Review files re status of case and continue discovery/investigation to develop proofs for summary judgment or trial; research

Date: Fri Jan 28, 05

Time: 1.00

Activity: Review Company Brief and various pleadings re Motion to Change Name

Date: Sat Jan 29, 05

Time: 1.75

Activity: Review and revise Response to Case Motion to Change Name

Date: Mon Mar 7, 05

Time: 0.50

Activity: Review file re possible revised injunction to cover post-IPO plant closure retirees

Date: Mon Mar 21, 05

Time: 1.25

Activity: Telephone conference with Saggau re VEBA; review correspondence to class members; correspondence with UAW re status

Date: Mon Mar 28, 05

Time: 1.75

Activity: Review documents re status post October 3rd retirees not covered by injunction; review VEBA; prepare memo to file re status and possible tactics

Date: Tue Apr 5, 05

Time: 0.75

Activity: Telephone conference with Saggau re VEBA; review VEBA documents; telephone conference with Atwood

Date: Mon Apr 11, 05

Time: 0.25

Activity: Telephone conference with Atwood; revise VEBA; correspondence with Saggau

Date: Tue Apr 12, 05

Time: 1.00

Activity: Prepare for meeting with Class Members

Date: Thu Apr 14, 05

Time: 4.50

Activity: Prepare for and attend meetings with retirees re status of lawsuit and status of efforts for retirees and spouses outside injunction; collect documents and information

Date: Tue Apr 19, 05

Time: 1.00

Activity: Review briefs and prepare for oral argument re corporate identity

Date: Thu May 5, 05

Time: 0.25

Activity: Revise correspondence to El Paso re coverage for post October 3, 1993 retirees

Date: Tue Jun 28, 05

Time: 0.75

Activity: Review various documents re employees not covered by injunction and re veba; telephone conference with Saggau

Date: Wed Jun 29, 05

Time: 1.25

Activity: Review and research issues re veba and class members not covered by injunction; telephone conference with class member

Date: Thu Jun 30, 05

Time: 0.25

Activity: Review correspondence and documents re VEBA fund

Date: Tue Jul 5, 05

Time: 2.25

Activity: Review documents and correspondence re open discovery, veba and possible amendments to injunction; review veba; draft correspondence to Case re amending VEBA

Date: Thu Jul 7, 05

Time: 1.25

Activity: Review correspondence; work on draft VEBA letter to Case; research re case law; telephone conference with Case attorneys

Date: Fri Jul 8, 05

Time: 0.50

Activity: Finalize draft VEBA letter; correspondence with Saggau and Atwood

Date: Thu Jul 14, 05

Time: 2.00

Activity: Review Case Motion to Dismiss CNH Global; review documents and research

Date: Wed Jul 27, 05

Time: 0.50

Activity: Review El Paso Motion to Modify Injunction

Date: Thu Jul 28, 05

Time: 0.50

Activity: Review El Paso Motion to Modify Preliminary Injunction

Date: Fri Aug 12, 05

Time: 2.50

Activity: Research re El Paso Motion to Modify Injunction

Date: Tue Aug 16, 05

Time: 2.50

Activity: Research re El Paso Motion to Modify Injunction; review Motion and Preliminary Injunction decision and appeal pleadings

Date: Wed Aug 17, 05

Time: 0.50

Activity: Telephone conference with Valco; telephone conference with July 1, 1994 retiree re health care coverage; prepare note to file

Date: Tue Aug 23, 05

Time: 1.75

Activity: Review El Paso Motion to Modify Health Care Injunction; telephone conference with attorney for El Paso; telephone conference with attorney for CNH; draft Stipulation to Extend Time for Plaintiffs to Respond; draft correspondence to attorneys for El Paso and Case

Date: Mon Aug 29, 05

Time: 0.50

Activity: Finalize Stipulation and Order re Response to Motion to Modify Motion; telephone conference with the Court

Date: Tue Sep 20, 05

Time: 1.75

Activity: Work on Response to El Paso's Motion to Modify Injunction

Date: Wed Sep 21, 05

Time: 1.50

Activity: Finalize Response to El Paso Motion to Modify Preliminary Injunction

Date: Tue Sep 27, 05

Time: 0.50

Activity: Telephone conference with El Paso attorney re changes and re scheduling; review and sign Stipulation

Date: Thu Dec 1, 05

Time: 3.00

Activity: Review documents in preparation for deposition

Date: Fri Nov 18, 05

Time: 0.75

Activity: Review Reply Brief re El Paso Motion to Modify Injunction

Date: Mon Nov 28, 05

Time: 3.75

Activity: Review Defendant's Appeal Briefs and Reply Briefs

Date: Fri Dec 2, 05

Time: 5.00

Activity: Review El Paso and Case Reply Briefs; work on memo summarizing Reply Brief arguments; research Defendant's cases

Date: Sat Dec 3, 05

Time: 6.00

Activity: Research and review Briefs re oral argument

Date: Sun Dec 4, 05

Time: 4.00

Activity: Research and work on oral argument

Date: Mon Dec 5, 05

Time: 3.50

Activity: Research and prepare re oral argument at Sixth Circuit

Date: Tue Jan 3, 06

Time: 1.25

Activity: Work on Supplemental Brief re El Paso Motion to Modify Injunction

Date: Thu Jan 19, 06

Time: 0.75

Activity: Review Sixth Circuit Decision re discovery strategy in both Yolton and Reese matters

Date: Mon Feb 13, 06

Time: 0.50

Activity: Review Company Sixth Circuit Brief re reconsideration

Date: Mon Feb 20, 06

Time: 1.00

Activity: Review correspondence and documents

Date: Sun Feb 26, 06

Time: 2.00

Activity: Review Decision and Briefs re Case Petition for Rehearing; revise Reply

Date: Tue Feb 28, 06

Time: 4.00

Activity: Research and work on Reply in Opposition to Petition for Rehearing

Date: Wed Mar 1, 06

Time: 2.50

Activity: Work on Reply on Opposition to Case Petition for Rehearing

Date: Thu Mar 16, 06

Time: 1.50

Activity: Review correspondence and file; correspondence with Atwood re non-compliance with injunction and unilateral changes in health care

Date: Fri Mar 17, 06

Time: 0.50

Activity: Telephone conference with Atwood re changes in health care

Date: Mon Mar 20, 06

Time: 0.50

Activity: Telephone conference with Atwood re unilateral changes in retiree health care

Date: Thu Apr 13, 06

Time: 0.75

Activity: Telephone conference with the Court; review file; telephone conference with other attorneys re status conference

Date: Fri Apr 14, 06

Time: 1.00

Activity: Telephone conference with the Court; draft letter re status conference; several telephone conferences with other attorneys re scheduling

Date: Wed May 24, 06

Time: 2.25

Activity: Prepare for and attend status conference; telephone conference with El Paso attorneys re settlement discussions

Date: Thu May 25, 06

Time: 1.00

Activity: Draft memo re strategy and re VEBA distribution issue; review UAW production and proposed Stipulation

Date: Mon Jun 19, 06

Time: 1.00

Activity: Telephone conference with Atwood; review materials re El Paso proposed plan changes; prepare for conference with El Paso attorneys

Date: Tue Jun 20, 06

Time: 6.00

Activity: Review correspondence and Plan documents; review El Paso's Motion to Modify; conference with Atwood re proposed modifications to injunction; prepare for and attend conference with El Paso attorneys re proposed modifications

Date: Tue Jun 27, 06

Time: 2.00

Activity: Prepare for and attend status conference re overall status and El Paso Motion to Modify Injunction

Date: Mon Aug 14, 06

Time: 0.75

Activity: Review Briefs re Petition for Cert

Date: Fri Aug 18, 06

Time: 0.50

Activity: Review Cert Petition Briefs

Date: Mon Aug 28, 06

Time: 2.00

Activity: Work on correspondence re El Paso waiver of privilege; research and review El Paso materials re proposed modifications to health care plan

Date: Wed Sep 6, 06

Time: 1.00

Activity: Review Motions and Briefs re indemnification issue; review issues re El Paso disclosure of alleged privileged material

Date: Thu Sep 7, 06

Time: 3.00

Activity: Research; review Motion; numerous telephone conferences with El Paso attorneys and Court re privilege issues and El Paso exhibit

Date: Fri Sep 8, 06

Time: 0.75

Activity: Review materials re Protective Order and El Paso Exhibit 7

Date: Sat Sep 9, 06

Time: 1.50

Activity: Research re privilege and waiver -- El Paso exhibit

Date: Mon Sep 18, 06

Time: 1.00

Activity: Review proposed modifications

Date: Thu Nov 2, 06

Time: 0.50

Activity: Review proposed interim changes

Date: Mon Nov 20, 06

Time: 1.50

Activity: Telephone conference with the Court re status conference; review correspondence; telephone conference with El Paso attorney; correspondence with Case attorney; review file

Date: Thu Nov 30, 06

Time: 2.50

Activity: Prepare for and attend status conference; review materials re proposed administrative changes

Date: Wed Mar 14, 07

Time: 1.50

Activity: Work on Response Brief to CNH Motion for Summary Judgment

Date: Thu Mar 15, 07

Time: 0.75

Activity: Work on discovery issues

Date: Wed Mar 21, 07

Time: 1.00

Activity: Work on discovery issues

Date: Sun Mar 25, 07

Time: 2.00

Activity: Telephone conferences with several deponents; prepare for depositions

Date: Mon Mar 26, 07

Time: 6.00

Activity: Review documents and prep for depositions of Roberts; Castillo; Hungerford and Kiriaki

Date: Tue Mar 27, 07

Time: 13.00

Activity: Travel to Racine and conference with Roberts and Castillo re prep for depositions; review documents and prep for Hungerford and Kiriaki depositions

Date: Wed Mar 28, 07

Time: 10.50

Activity: Prepare for and attend Roberts and Castillo depositions; telephone conferences with Hungerford and Kiriaki re depositions; review documents

Date: Thu Mar 29, 07

Time: 12.50

Activity: Conference with Hungerford and Kiriaki re prep for depositions; review documents re depositions

Date: Fri Mar 30, 07

Time: 16.50

Activity: Prepare for and attend Hungerford and Kiriaki depositions; travel

Date: Sun Apr 1, 07

Time: 2.00

Activity: Organize files and documents re discovery issues

Date: Thu Apr 5, 07

Time: 1.25

Activity: Organize deposition exhibits; correspondence with Roberts and Castillo

Date: Wed Oct 24, 07

Time: 0.50

Activity: Review file re strategy of discovery and 30(b)(6) witness

Date: Sun Nov 18, 07

Time: 3.50

Activity: review briefs re summary judgement and agaes; research; work on oral argument.

Date: Mon Nov 19, 07

Time: 13.00

Activity: Work on various Reply Briefs; review Defendant Briefs; research and prepare for hearing

Date: Tue Nov 20, 07

Time: 9.50

Activity: Finalize Reply Briefs; prepare for and attend oral argument for Summary Judgment and multiple Motions

Date: Wed Nov 28, 07

Time: 3.50

Activity: Review post-hearing Brief; review transcript; work on Reply

Date: Thu Nov 29, 07

Time: 3.00

Activity: Draft memo and review various transcripts; work on Reply Brief facts and outline

Date: Fri Nov 30, 07

Time: 4.00

Activity: Review transcripts and work on Reply Brief

Date: Sun Dec 2, 07

Time: 3.50

Activity: Work on Reply Brief

Date: Mon Dec 10, 07

Time: 0.75

Activity: Review Plaintiffs' Reply Brief re summary judgment

Date: Fri Dec 21, 07

Time: 1.00

Activity: Review El Paso's Brief re Supplemental Exhibit Brief and exhibits

Date: Wed Dec 26, 07

Time: 0.50

Activity: Review El Paso supplemental exhibit; office conference re strategy

Date: Wed Mar 12, 08

Time: 1.50

Activity: Review Court Decisions

Date: Tue Mar 18, 08

Time: 1.25

Activity: Work on damages procedure; work on settlement letter to El Paso

Date: Thu Mar 20, 08

Time: 1.25

Activity: Review El Paso Motion for Clarification; review Court Decision

Date: Mon Mar 24, 08

Time: 1.50

Activity: Review and research re Case and El Paso Motions for Clarification

Date: Mon Apr 7, 08

Time: 1.50

Activity: Review proposal re damage system; review Court decisions and Case and El Paso Clarification Motions

Date: Fri Apr 11, 08

Time: 1.25

Activity: Review materials re damage issues; prepare for conference with El Paso attorneys

Date: Tue Apr 15, 08

Time: 2.00

Activity: Conference with attorneys for El Paso re damage issues

Date: Thu Apr 17, 08

Time: 1.75

Activity: Review Court decisions; review Case Motion to Clarify; conference with McClow

Date: Sun Apr 20, 08

Time: 1.00

Activity: Review decisions and briefs re CNH Motion to Reconsider or Clarify Denial of Summary Judgment on VEBA defense; work on draft Response

Date: Mon Apr 21, 08

Time: 2.25

Activity: Review various pleadings and work on Response to CNH Motion to Reconsider or Clarify Denial of Summary Judgment on VEBA

Date: Wed May 7, 08

Time: 0.50

Activity: Review court decision of Case affirmative defenses

Date: Thu Jul 17, 08

Time: 0.75

Activity: Review correspondence and proposed Order re release of surety money to Class Members; review settlement correspondence; telephone conference with El Paso attorney and email re settlement conference

Date: Sun Jul 20, 08

Time: 1.50

Activity: Review file re settlement issues; prepare for conference with El Paso

Date: Tue Jul 22, 08

Time: 4.25

Activity: Settlement conference with El Paso

Date: Fri Oct 31, 08

Time: 1.00

Activity: Review proposed stipulations and work on reply

Date: Mon Nov 10, 08

Time: 0.50

Activity: Telephone conference with Nicholson; review correspondence re discovery

Date: Tue Dec 16, 08

Time: 1.00

Activity: Review correspondence and motions re trial discovery

Date: Tue Dec 23, 08

Time: 1.00

Activity: Review file re trial strategy and deposition schedule

Date: Mon Jan 5, 09

Time: 1.50

Activity: Trial prep

Date: Wed Jan 7, 09

Time: 3.00

Activity: Telephone conference with Court; trial prep

Date: Thu Jan 8, 09

Time: 8.50

Activity: Work on Final Pre-Trial Order; trial prep

Date: Fri Jan 9, 09

Time: 9.00

Activity: Work on Final Pre-Trial Order; trial prep

Date: Sat Jan 10, 09

Time: 6.00

Activity: Trial prep

Date: Sun Jan 11, 09

Time: 4.00

Activity: Trial prep

Date: Mon Jan 12, 09

Time: 11.00

Activity: Trial prep

Date: Tue Jan 13, 09

Time: 6.00

Activity: Trial prep; attend final pre-trial conference

Date: Wed Jan 14, 09

Time: 7.00

Activity: Trial prep

Date: Thu Jan 15, 09

Time: 9.50

Activity: Trial prep; conference with Atwood and Shoemaker

Date: Fri Jan 16, 09

Time: 0.25

Activity: Trial prep

Date: Sat Jan 17, 09

Time: 0.75

Activity: Trial Prep

Date: Sun Jan 18, 09

Time: 7.50

Activity: Trial prep

Date: Mon Jan 19, 09

Time: 7.00

Activity: Trial prep

Date: Tue Jan 20, 09

Time: 12.00

Activity: Trial prep

Date: Wed Jan 21, 09
Time: 10.00
Activity: Trial prep

Date: Thu Jan 22, 09
Time: 6.25
Activity: Prepare for trial; conference at court; telephone conferences (numerous) with witnesses; emails with witnesses; organize files

Date: Fri Jan 23, 09
Time: 4.25
Activity: Trial prep

Date: Sat Jan 24, 09
Time: 0.75
Activity: Telephone conference with El Paso attorneys; telephone conference with Court; telephone conference with witnesses

Date: Sun Jan 25, 09
Time: 0.50
Activity: Trial prep -- review testimony

Date: Mon Jan 26, 09
Time: 4.50
Activity: Trial prep

Date: Tue Jan 27, 09
Time: 15.00
Activity: Trial prep and trial

Date: Wed Jan 28, 09
Time: 13.50
Activity: Trial prep and trial

Date: Thu Jan 29, 09
Time: 13.00
Activity: Trial prep and trial

Date: Sun Feb 1, 09
Time: 1.25
Activity: Organize files

Date: Thu Feb 5, 09
Time: 0.50
Activity: Work on trial depositions

Date: Fri Feb 6, 09

Time: 2.50

Activity: Review Kale deposition and Plaintiffs' and Defendants' designations; draft correspondence to CNH attorneys re corrections in designations

Date: Thu Aug 27, 09

Time: 0.50

Activity: Research re settlement issues

Date: Fri Aug 28, 09

Time: 1.00

Activity: Research re settlement issues

Date: Tue Sep 1, 09

Time: 2.25

Activity: Review 6th Circuit Decision in Reese; review Duggan decision in Yolton re modifications; research and draft working memo re status of Yolton

Date: Mon Sep 21, 09

Time: 2.00

Activity: Review file re settlement; telephone conference with Saggau and Social Security re benefit packages and settlement; work on settlement issues

Date: Mon Oct 12, 09

Time: 0.50

Activity: Telephone conference with Class Representatives re status of litigation and change in carriers

Date: Tue Oct 13, 09

Time: 0.75

Activity: Review file re settlement; review CNH Supplemental Authority re Klaccord and satisfaction; affirmative defense

Date: Thu Oct 22, 09

Time: 0.50

Activity: Review materials re settlement proposal

Date: Thu Oct 29, 09

Time: 2.00

Activity: Review Court decision on accord and satisfaction; work on settlement proposal

Date: Tue Dec 15, 09

Time: 0.50

Activity: Review settlement correspondence; email to El Paso attorneys

Date: Fri Dec 18, 09

Time: 0.50

Activity: Review settlement materials

Date: Fri Jan 8, 10

Time: 0.50

Activity: Review file re status of settlement talks

Date: Tue Jan 12, 10

Time: 5.75

Activity: Prepare for and attend settlement negotiations

Date: Tue Jan 26, 10

Time: 0.25

Activity: Review file re settlement negotiations

Date: Wed Jan 27, 10

Time: 4.00

Activity: Prepare for and attend settlement meeting with El Paso

Date: Fri Jan 29, 10

Time: 2.25

Activity: Work on memo re settlement options and analysis

Date: Wed Feb 3, 10

Time: 0.50

Activity: Review settlement materials

Date: Fri Feb 12, 10

Time: 2.00

Activity: Prepare for and participate in settlement conference; review files re settlement issues

Date: Sun Feb 14, 10

Time: 0.50

Activity: miscellaneous

Date: Mon Feb 15, 10

Time: 0.50

Activity: Review settlement materials; work on memo re actuarial analysis

Date: Mon May 24, 10

Time: 2.50

Activity: Review various issues re settlement and re status

Date: Thu May 27, 10

Time: 1.75

Activity: Review documents; work on settlement issues; telephone conference with El Paso attorneys

Date: Fri May 28, 10

Time: 3.25

Activity: Review files and research re various settlement issues and CNH indemnity; prepare for and participate in settlement conference with El Paso

Date: Mon May 31, 10

Time: 0.50

Activity: Review materials re settlement proposal and Medigap plans

Date: Mon Jun 7, 10

Time: 1.00

Activity: Review file re settlement

Date: Fri Sep 10, 10

Time: 3.50

Activity: Prepare for and meet with Yolton attorneys re settlement

Date: Wed Nov 10, 10

Time: 1.50

Activity: Review file and correspondence re status of settlement talks and analysis of various proposals

Date: Fri Nov 12, 10

Time: 2.25

Activity: Review settlement file; conference with Saggau and Harrell re settlement issues and strategy

Date: Tue Dec 21, 10

Time: 2.25

Activity: Review settlement file; attend conference with Secretary-Treasurer Williams and Mike Saggau

Date: Thu Dec 23, 10

Time: 1.50

Activity: Work on settlement materials

Date: Wed Feb 2, 11

Time: 1.00

Activity: Work on El Paso settlement term sheet

Date: Mon Feb 14, 11

Time: 1.25

Activity: Prepare for settlement talks with El Paso; review CNH materials re indemnity

Date: Tue Feb 15, 11

Time: 7.00

Activity: Settlement negotiations with El Paso

Date: Wed Feb 16, 11

Time: 0.25

Activity: Prepare for and attend settlement negotiations

Date: Wed Feb 23, 11

Time: 1.25

Activity: Review and revise Settlement Agreement

Date: Tue Mar 1, 11

Time: 0.75

Activity: Review materials re settlement

Date: Wed Mar 16, 11

Time: 0.50

Activity: Email with El Paso and work on settlement

Date: Thu Mar 17, 11

Time: 0.75

Activity: Telephone conference with El Paso; work on settlement issues

Date: Wed Apr 6, 11

Time: 0.75

Activity: Work on settlement

Date: Thu Apr 14, 11

Time: 0.75

Activity: Work on Tolling Agreement

Date: Tue Apr 19, 11

Time: 0.75

Activity: Review lawsuit v. UAW; work on settlement

Date: Wed Apr 20, 11

Time: 1.25

Activity: Research re CNH role and work on settlement; telephone conference with Company attorney; memo re strategy

Date: Fri May 20, 11

Time: 3.75

Activity: Research re settlement issues; work on settlement documents

Date: Sun May 22, 11

Time: 2.25

Activity: Research and memo re CNH proposal re Tolling Agreement

Date: Mon May 23, 11

Time: 2.25

Activity: Research re Tolling Agreement and CNH; work on revisions to Tolling Agreement; email to Saggau

Date: Tue May 24, 11

Time: 0.75

Activity: Revise Tolling Agreement; email to El Paso and UAW

Date: Fri Jun 3, 11

Time: 1.00

Activity: Telephone conference with Yolton attorneys; review CNH counter proposal on tolling agreement

Date: Sun Jun 5, 11

Time: 0.75

Activity: Work on correspondence to El Paso attorneys and revisions to Tolling Agreement; review settlement materials

Date: Mon Jun 6, 11

Time: 0.50

Activity: Telephone conference with El Paso attorneys; review settlement materials

Date: Tue Jun 7, 11

Time: 1.00

Activity: Revise Tolling Agreement; correspondence to El Paso attorneys; review settlement materials

Date: Wed Jun 8, 11

Time: 0.25

Activity: Telephone conference with El Paso attorneys re settlement issues

Date: Thu Jun 16, 11

Time: 0.50

Activity: Review file; telephone conference with Yolton attorneys re Tolling Agreement and CNH

Date: Mon Jun 27, 11

Time: 1.00

Activity: Review settlement materials; work on settlement issues

Date: Tue Jun 28, 11

Time: 1.00

Activity: Review and revise settlement

Date: Wed Jun 29, 11

Time: 1.75

Activity: Work on settlement

Date: Thu Jun 30, 11

Time: 5.00

Activity: Conference with El Paso; work on settlement

Date: Fri Jul 1, 11

Time: 2.25

Activity: Settlement negotiations with El Paso; work on settlement

Date: Fri Jul 8, 11

Time: 1.00

Activity: Review Decision and pleading re attorneys fees

Date: Mon Jul 11, 11

Time: 1.25

Activity: Review settlement materials re tolling; successorship and credit support

Date: Tue Jul 12, 11

Time: 1.25

Activity: Review Company proposal re credit security for benefits and successorship; review proposal re dismissal of CNH lawsuit v. UAW and tolling

Date: Tue Jul 19, 11

Time: 0.75

Activity: Finalize Tolling Agreement; telephone conference with Company

Date: Tue Jul 26, 11

Time: 1.00

Activity: Revise successorship provision; review and revise credit support provisions

Date: Thu Jul 28, 11

Time: 0.50

Activity: Work on settlement

Date: Fri Jul 29, 11

Time: 0.75

Activity: Review settlement materials

Total Hours: 636.50

ATTORNEY HOURS
Judith Sale

Date: Mon Jan 19, 04

Time: 4.00

Activity: Numerous telephone conferences with retirees re payment of February premiums

Date: Tue Jan 20, 04

Time: 2.00

Activity: Numerous telephone conferences with retirees re payment of February premiums

Date: Wed Jan 21, 04

Time: 2.00

Activity: Numerous telephone conferences with retirees re payment of February premiums

Date: Thu Jan 22, 04

Time: 2.00

Activity: Several telephone conferences with retirees re payment of February premiums

Date: Fri Jan 23, 04

Time: 2.00

Activity: Several telephone conferences with retirees re paying February premiums

Date: Wed Jun 28, 06

Time: 4.00

Activity: Review and summarize documents

Date: Thu Jun 29, 06

Time: 6.00

Activity: Review and summarize documents

Date: Mon Jul 3, 06

Time: 6.00

Activity: Review and summarize documents

Date: Wed Jul 5, 06

Time: 5.00

Activity: Review and summarize documents

Date: Thu Jul 6, 06

Time: 2.00

Activity: Review and summarize documents

Total Hours: 35.00 hours

ATTORNEY HOURS

John Canzano

Date: Fri Feb 13, 04

Time: 1.00

Activity: Work on public records database searches re business entities

Date: Wed Sep 15, 04

Time: 0.25

Activity: File appeal briefs

Total Hours: 1.25 hours

ATTORNEY HOURS

Lisa Smith

Date: Wed Jan 4, 06

Time: 0.75

Activity: Review files; draft Ex Parte Motion, Brief and proposed Order for leave to file a supplemental brief and exhibits

Date: Wed Sep 6, 06

Time: 1.25

Activity: Research ethical issues re exhibit; compile materials

Date: Thu Sep 7, 06

Time: 3.75

Activity: Deal with Exhibit 7 issues; telephone conference with El Paso attorney Keinbaum (several times); email to Keinbaum; telephone conference with Judge Duggan's clerk (several times); draft Stipulated Order; review files

Total Hours: 5.75

ATTORNEY TIME
David Radtke

Date: Thu Aug 16, 07

Time: 0.75

Activity: Review Response Brief

Total Hours: .75 hours

ATTORNEY TIME
Patrick Rorai

Date: Thu Jan 29, 04

Time: 3.25

Activity: Review and revise brief in opposition to El Paso's motion for reconsideration

Date: Thu May 13, 04

Time: 0.75

Activity: Review Brief regarding Case's Motion for Reconsideration

Date: Thu May 20, 04

Time: 0.50

Activity: Review documents from Antoinette Jacob

Date: Fri Jul 2, 04

Time: 0.50

Activity: Review and revise Motion

Date: Tue Jun 28, 05

Time: 0.50

Activity: Deliver documents to Nicholson at UAW

Date: Tue Sep 13, 05

Time: 2.50

Activity: Research re 30 (b)(6) witnesses

Date: Wed Sep 14, 05

Time: 3.75

Activity: Research re 30 (b)(6) witnesses; conference with Reese

Date: Wed Sep 21, 05

Time: 1.00

Activity: Draft, review and revise Brief

Date: Tue Apr 18, 06

Time: 1.25

Activity: Review file and court docket re status conference; telephone conference with Edelschick; telephone conference with Kienbaum; telephone conference with Rogaczewski

Date: Wed Apr 19, 06

Time: 0.25

Activity: Correspondence with Kienbaum and Edelschick

Date: Mon Apr 23, 07

Time: 0.75

Activity: Review Plaintiff's Response to El Paso's Supplemental Brief in Support of its
Motion to Modify the Contractual Health Care Plan

Date: Mon May 21, 07

Time: 0.75

Activity: Review documents and organize files

Total Hours: 15.75

ATTORNEY TIME
Meagan Dolleris

Date: Tue Sep 29, 09

Time: 1.25

Activity: Conference with RJM; import documents into Trial Director

Date: Wed Sep 30, 09

Time: 2.00

Activity: Import documents into Trial Director; conference with paralegal re importing documents

Date: Thu Oct 1, 09

Time: 0.25

Activity: Conference with Christina re Trial Director documents

Date: Tue Feb 22, 11

Time: 1.25

Activity: Review Settlement Agreement

Date: Thu Mar 3, 11

Time: 0.75

Activity: Review Settlement Exhibits

Date: Thu Apr 21, 11

Time: 0.50

Activity: Conference re research re indemnity agreements

Date: Mon Apr 25, 11

Time: 1.75

Activity: Research indemnity law; review indemnity agreement

Date: Tue Apr 26, 11

Time: 2.50

Activity: Research indemnity law; draft memo re voiding indemnity agreement

Date: Thu Jul 28, 11

Time: 0.25

Activity: Review and redact information from Claim Forms

Total Hours: 10.50

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GLADYS YOLTON, WILBUR MONTGOMERY,
ELSIE TEAS, ROBERT BETKER, EDWARD
MAYNARD, and GARY HALSTED, on behalf
of themselves and a similarly situated class,

Plaintiffs,

Case No. 02-CV-75164

v

Patrick J. Duggan

EL PASO TENNESSEE PIPELINE CO., and
CNH AMERICA LLC,

Class Action

Defendants.

EXHIBIT B

TO

**AFFIDAVIT OF ROGER J. MCCLOW IN SUPPORT OF
MOTION FOR ATTORNEY AND EXPENSES**

LITIGATION EXPENSE SUMMARY

October 1, 2002 through July 31, 2011

Exhibit B
Litigation Expense Summary

Expense Item	Total Expense
Photocopies @ \$.15	\$35,557.95
Fax @ \$.25	\$1,205.00
Computer Research	\$30,293.42
Postage	\$8,672.13
Travel Expenses	\$51,908.82
Parking/Mileage	\$438.96
Witness Fees	\$618.00
Court Fees	\$227.95
Process Service	\$60.00
Court Reporter	\$17,951.22
Electric Document Fee	\$836.58
Witness Expense	\$6,738.92
Shipping	\$12.79
Telephone	\$770.25
Labels, File Folders	\$3,088.32
Express Mail	\$5,448.06
Meeting Expense	\$6,548.80
Printing/Copy Fees	\$13,673.63
Transcript	\$385.45
Database Design Services	\$1,600.00
Mass Mailing Expenses	\$3,096.70
Professional Acct Fees	\$660.00
Dedicated Clerical @ \$20	\$9,080.00
Total	\$198,872.95